

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

M.J. No. 23-5178-JGD

v.

RAFAEL DAVILA,  
a/k/a “ROBBIN HOOD,”  
JOSE TORRES,  
a/k/a “GOLDY,” a/k/a “GOLDY TECH,”  
NICOLAS DAVILA,  
CARLOS FONSECA,  
a/k/a “CHARLITO,”  
ZACHARY MARSHALL,  
SANTO FELIBERTY,  
ALEX OYOLA,  
a/k/a “DIRTY,”

Defendants

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

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**AFFIDAVIT OF TASKFORCE OFFICER CHRISTOPHER RYAN IN SUPPORT OF AN  
APPLICATION FOR CRIMINAL COMPLAINT**

I, Taskforce Officer Christopher Ryan, being first duly sworn, depose and state as follows:

1. I am a Massachusetts State Police Officer and have been employed as such since 2015. I am currently assigned as a criminal investigator to the Special Service Section / Organized Crime Unit and have been so assigned since September of 2019. The Massachusetts State Police Special Service Section is a statewide investigative unit concerned primarily with the investigation of traditional and non-traditional organized crime syndicates. The Massachusetts State Police Special Service Section works closely with the Organized Crime Squad of the Boston Division of the Federal Bureau of Investigation. As a result of this close working relationship with the Federal Bureau of Investigation, all members of the State Police Special Service Section are both Federal Bureau of Investigation Task Force Officers (“TFO”) and Special Deputy United States Marshals.

2. I have participated and/or conducted several investigations in conjunction with federal, state and local law enforcement agencies as a Task Force Officer (“TFO”). I have participated and/or conducted several investigations involving, but not limited to, traditional and non-traditional organized criminal conspiracies, including investigations involving search warrants authorizing the court-ordered interception of telephone calls (so-called “wiretap”) involving organized crime conspiracies. I have participated in the execution of several other search warrants. I have been the affiant of a wire-tap targeting organized crime as well as search warrants involving illegal distribution of narcotics. I have testified in Suffolk Superior Court pertaining to crimes involving organized crime, narcotics distribution, and firearms offenses. I have performed law enforcement duties in an undercover capacity on numerous occasions.

3. I am assigned to this investigation and have worked closely with other FBI special agents, officers from the Massachusetts State Police and other law enforcement personnel during this investigation. Accordingly, I am familiar with the facts concerning this investigation. All dates, times, locations, distances, and amounts are approximate. Because this affidavit is being submitted for the limited purpose of securing the requested criminal complaints and arrest warrants, I have not included each and

every fact known to me concerning this investigation. I make this affidavit based upon personal knowledge derived from my participation in this investigation and upon information (whether received directly or indirectly) that I believe to be reliable from numerous sources including, but not limited to, the following:

- a. My training and experience investigating organized theft and money laundering crimes;
- b. Oral reports, written reports, and documents that I have received from other federal, state, and local law enforcement agents;
- c. Physical and electronic surveillance conducted by me and other federal, state, and local law enforcement officers;
- d. Crime scene photographs and evidence seized;
- e. Surveillance video and photographs;
- f. Public records;
- g. Business records;
- h. Telephone toll records, pen register and trap and trace information, and telephone subscriber information;
- i. Historical Cell Site Location Information (CLSI), engineering data from cell phone carriers, and precise location information for cellular telephones;
- j. Queries of law enforcement records and intelligence databases;
- k. Execution of search warrants;
- l. Social media postings, videos and images;
- m. Review of data and information obtained by Orders issued under 18 U.S.C. Section 2703(d), and Search Warrants;
- n. Historical GPS tracking data derived from tracking devices affixed to vehicles; and
- o. Arrests of co-conspirators.

## **I. CHARGES SOUGHT**

4. This affidavit supports an application for criminal complaint charging the following crimes in violation of federal law. Specifically, I am seeking to charge (1) RAFAEL DAVILA with Counts One, Two, Three, Four and Five; (2) JOSE TORRES with Counts One, Two and Five; (3) NICOLAS DAVILA,

with Counts One and Two; (4) CARLOS FONSECA with Counts One and Two; (5) ZACHARY MARSHALL, with Counts One and Two; (6) SANTO FELIBERTY with Counts One, Two, Three, and Four; and (7) ALEXANDER OYOLA with Counts One, Two, and Three. The violations of federal law are as follows:

- a. Count One, Conspiracy to Transport Stolen Property Valued Over \$5,000 in Interstate Commerce, in violation of 18 U.S.C. § 371;
- b. Count Two, Interstate Transportation of Stolen Property Valued Over \$5,000, in violation of 18 U.S.C. § 2314;
- c. Count Three, Conspiracy to Steal More than \$1,000 from a Federally Insured Bank, in violation of 18 U.S.C. § 371;
- d. Count Four, Theft of More than \$1,000 from a Federally Insured Bank, in violation of 18 U.S.C. § 2113(b);
- e. Count Five, Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h).

## **II. BACKGROUND CONCERNING CATALYTIC CONVERTERS**

5. Based upon information learned from law enforcement sources, and from other national investigations, I have become familiar with the nature of catalytic converters, their resale, and the patterns and practices of catalytic converter thieves. Catalytic converters are a component of an automotive vehicle's exhaust system that reduce the toxic gas and pollutants from a vehicle's internal combustion engine into safe emissions by catalyzing a redox reaction process. Catalytic converters use precious metals in their center or "core" and are regularly targeted for theft due to the high value of these metals. Catalytic converters are required components on all combustion engine automobiles in the United States as regulated by the Environmental Protection Agency ("EPA"). Every individual state in the United States dictates emission standards for their catalytic converters, which makes the concentration of precious metals in catalytic converters vary from state-to-state.

6. Thieves steal catalytic converters from vehicles for the precious metals that the cores contain, including palladium, platinum, and rhodium. Some of these precious metals are more valuable per ounce than gold and their value has been increasing in recent years. The black-market price for certain catalytic converters can be above \$1,000 each. Catalytic converters are often stolen from the underside of

vehicles by using handheld power tools (including reciprocating saws, sawzalls, pneumatic or hydraulic pipe-cutters, or oxy-acetylene gas cutting torches) and automotive tools (floor jacks and jack stands). Skilled thieves can remove a catalytic converter completely within a few minutes or less. Additionally, catalytic converters often lack unique serial numbers, VIN information, or other distinctive identification features, making them difficult to trace to their lawful owner. Thus, the theft of catalytic converters has become increasingly popular because of their value, relative ease to steal, and their lack of identifying markings.

7. Catalytic converter thieves are well-informed about which vehicle makes and models contain the most precious metals in their catalytic converters. Thieves typically obtain pricing information from online pricing applications that list the purchase price of catalytic converters taken from certain make and model of cars. This price is believed to be calculated based on the known quantity of precious metal in the catalytic converter for a certain make and model of vehicle as compared to the price of the precious metal on the commodity market. Catalytic converter thieves (sometimes referred to as "cutters") often conduct searches in residential neighborhoods, parking lots, industrial areas, and other locations to identify and steal the most high-value catalytic converters. Often these high-value catalytic converters are on trucks, and thieves target businesses and industrial parks that have multiple trucks of the same make and model containing high value catalytic converters. Additionally, certain vehicles such as larger trucks and vans have multiple catalytic converters that can be taken from a single vehicle. Based on the confluence of these factors, catalytic converter theft has become a nationwide problem across many state, local, and federal jurisdictions. The theft of a vehicle's catalytic converter results in damage that renders the vehicle inoperable until properly replaced. Not only are the vehicles mechanically unable to be driven, but they are also not legally operable under the EPA regulations until repaired.

8. The process to remove the precious metals from the catalytic converters is complex and may release toxic gases. Therefore, catalytic converters are typically sold intact to an extraction company or "core buyer." The extraction company will remove the core from the catalytic converter using a "decanning" process that crushes the honeycomb structure (or "brick") inside the core, resulting in precious

metal powders. The process of de-canning will crush the core or brick inside the catalytic converters; new bricks are not available for sale to the general public. The precious metal powders are then sold to a metal refinery for further processing.

9. The cost of a catalytic converter ranges between \$500 and \$8,000, depending on the vehicle's make and model. In general, the larger the engine, the more expensive the converter. Consequently, catalytic converter theft has a profound effect on interstate commerce. Individuals are left without the use of their vehicle until it is repaired, and cannot get to work, bring their children to school, or go about their day. Businesses are left unable to deliver their products, pickup supplies, or service their customers. And if multiple vehicles in a business's fleet are targeted, then the business must obtain replacement vehicles in order to meet the demands of the day while the damaged vehicles are repaired. In the course of this investigation, I have learned that it is not uncommon for targeted businesses to lose the use of their trucks and vehicles for multiple weeks while replacement parts are ordered and repairs take place. Additionally, the same businesses are often targeted repeatedly because they happen to have a fleet comprised of vehicles with high-value catalytic converters. Investigators in this case have personally spoken to local automobile repair companies and other subject matter experts who have stated that in many instances the necessary parts to make the repairs are backordered in excess of six (6) weeks. Replacement parts and labor can exceed \$10,000 per vehicle. Labor is added because the valuable portion of the converter is cut out during the theft, and the remaining portions must be removed and disposed of, and new parts obtained and installed.

10. In order to deter such thefts in Massachusetts, new legislation was signed into law in January 2023. This legislation imposed a duty on any scrap metal dealer to create and keep records of any catalytic converters that are purchased. These records that must be maintained include the identity of the seller, a photograph of the catalytic converter, and documents showing that the person selling the catalytic converter had ownership of the vehicle from which the converter was taken. *See Mass. Gen. Laws Chapter 266, Section 148(e).*

### III. BACKGROUND OF OPERATION CUT & RUN

11. This investigation, dubbed Operation Cut & Run, was developed through the submission of local catalytic converter theft incidents to Mass Crime Net, which is an information sharing service run by the Massachusetts State Police Fusion Center. Mass Crime Net receives information from local police departments in the region and then distributes the information to the group of participating agencies. Through information-sharing facilitated by the service, local departments are alerted to missing persons, emergent public safety matters, and ongoing crimes and trends in neighboring communities. In this particular case, numerous local departments across Massachusetts were developing information that a Maroon Acura MDX was involved in catalytic converter thefts in their jurisdictions. These local police investigations of individual theft incidents resulted in surveillance video depicting a Maroon Acura MDX that had a number of identifying features: maroon color, distinct six (6) spoke rims, chrome running boards, tinted windows, a front split grille, no front plate, and visually distinct roof racks.

12. Review of surveillance video showed at least two suspects being involved in the thefts. In nearly all instances, the thefts took place late at night or in the early morning and the suspects wore dark clothing and utilized power tools. Some targeted vehicles required the use of a jack to lift the vehicles and gain access to the catalytic converters. The thefts were accomplished quickly, with each converter requiring 30 to 60 seconds to cut out and remove and the thieves knowing where to look for the converter based on the make/model of the vehicle they were targeting. There were also commonalities in the vehicles being targeted. Specifically, commercial delivery vehicles were favored, including Isuzu, Nissan, and Ford trucks and vans, and passenger vehicles such as Toyota Priuses and Corollas.

13. Through this investigation, Rafael DAVILA was identified as the owner of the Maroon Acura MDX, and the leader of an organized group of thieves committing these thefts. Rafael DAVILA would undertake the catalytic converter thefts with a group of individuals, including Carlos FONSECA, Nicolas DAVILA (brother to Rafael DAVILA), Zachary MARSHALL, and Santo FELIBERTY.

14. Once in possession of the stolen catalytic converters, the investigation revealed that Rafael DAVILA routinely transferred them to Jose TORRES, a/k/a “Goldy” who would accumulate stolen

catalytic converters from multiple theft crews. TORRES would then transport bulk quantities of stolen catalytic converters to dealers in Connecticut, Rhode Island, and the New York / New Jersey area, who would buy them and refine them. In particular, TORRES sold stolen catalytic converters to entities and individuals who have since been federally indicted for interstate transportation of stolen property and money laundering offenses related to catalytic converter thefts. These individuals include Alexander Kolitsas of Downpipe Depot charged federally in the District of Connecticut,<sup>1</sup> Lovin Khanna, and Ishu Lakra of DG Auto, a New Jersey based company charged federally in the Eastern District of California and Northern District of Oklahoma.<sup>2</sup>

#### IV. DEFENDANTS

##### A. RAFAEL DAVILA, a/k/a “ROBBIN HOOD”

15. I am familiar with Rafael DAVILA (dob xx/xx/1988, ssn: xxx-xx-7257) (DAVILA or R. DAVILA). DAVILA has been identified to be the user of a phone ending in 6609 (TARGET PHONE 1). Throughout the course of this investigation and the entirety of 2022, DAVILA resided in Feeding Hills, Massachusetts, which is a suburb south of Springfield, MA. DAVILA employs the handle “Robbin Hood” for his Facebook and Instagram accounts.

16. Based upon the investigation to date, DAVILA is believed to be the leader of the organized crew of catalytic converter thieves and burglars described in this affidavit. Investigators have identified DAVILA’s leadership roles based upon his meticulous recordkeeping of the crimes, including locations that were targeted, costs associated with the crimes, deliveries of the stolen property to the individuals responsible for monetizing it, and lists of profits and splits of the profits he maintained. Additionally, investigators have recovered text messages where DAVILA describes his role in organizing the crimes, his

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<sup>1</sup> See *United States v. Kolitsas, et. al.*, Docket No. 22-CR-171, ECF #1, Indictment (D. Conn. Aug. 16, 2022); “INDICTMENT CHARGES 5 MEN INVOLVED IN SCHEME TO STEAL AND SELL CATALYTIC CONVERTERS”, Aug. 24, 2022, available at <https://www.justice.gov/usao-ct/page/file/1533511/download>.

<sup>2</sup> See *United States v. Khanna, et. al.*, Docket No. 22-CR-0213, ECF #1, Indictment (E.D. Cal. Oct. 20, 2022); *United States v. Khanna, et. al.*, Docket No. 22-CR-348, ECF #1, Indictment (N.D. Okla. Oct. 4, 2022); “Justice Department Announces Takedown of Nationwide Catalytic Converter Theft Ring,” Nov. 2, 2022, available at <https://www.justice.gov/opa/pr/justice-department-announces-takedown-nationwide-catalytic-converter-theft-ring>.

planning and procurement of necessary tools and items, his connection to all the individuals responsible for monetizing the stolen catalytic converters and stolen property, and his participation in all of the thefts under investigation.

17. The investigation also revealed that DAVILA was also engaged in other thefts and burglaries unrelated to catalytic converters. As described in this affidavit, DAVILA, FELIBERTY, and OYOLA committed burglaries of jewelry stores, stolen snowblowers, motor vehicles and a trailer. DAVILA, FELIBERTY, and OYOLA are believed to have monetized in the stolen jewelry through a coconspirator known to investigators (referred to as “CC-2”) who is located in Connecticut. DAVILA, FELIBERTY, and OYOLA also stole money from federally insured bank ATMs. Furthermore, DAVILA and MARSHALL conducted a burglary of a storage facility and stole tools that were monetized through CC-2.

18. DAVILA is not known to be gainfully employed and investigators are not aware of DAVILA travelling to a place of employment during 2022. Based upon the number of incidents to which he is connected, his statements and text messages, DAVILA is believed to engage in catalytic converter thefts and burglaries on a full-time basis, committing these crimes multiple nights per week for upwards of eight hours a night.

19. A photograph of DAVILA from the Massachusetts RMV follows:



*1. Criminal Record*

20. I am also familiar with DAVILA's criminal history. DAVILA has a number of arrests for violent crimes and receipt of stolen motor vehicles that did not result in conviction. DAVILA's criminal history lists the following pertinent convictions:

- a. Connecticut Docket No. U04W-CR19-0458342-S, charging Larceny 3<sup>rd</sup> Degree, for which DAVILA was convicted and sentenced on August 23, 2021. DAVILA was sentenced to 5 years in prison suspended, with a conditional discharge for 3 years. DAVILA is believed to be currently on conditional discharge for this crime. Police reports related to this incident revealed that DAVILA stole a trailer, and then fled from police when they attempted to stop him. As a result of this conviction, investigators believe that DAVILA remains subject to the conditional discharge and will be subject to the imposition of the suspended 5 years of jail time if he were found to have violated this conditional discharge.
- b. Palmer District Court, Docket No. 2043CR000596, charging obscuring license plate, and negligent operation of a motor vehicle, for which DAVILA was convicted on July 10, 2020. DAVILA was sentenced to 90 days in jail.
- c. Palmer District Court, Docket No. 2043CR000594, charging negligent operation of a motor vehicle, for which DAVILA was convicted on July 10, 2020. DAVILA was sentenced to 90 days in jail.
- d. Albany County Court, New York, Docket No. 2-5066, charging burglary 3<sup>rd</sup> degree, and illegal entry to commit a felony, for which DAVILA was convicted on March 6, 2015. DAVILA was sentenced to 1 to 3 years in prison.
- e. Palmer District Court, Docket No. 0843CR000207, charging receiving stolen property, for which DAVILA was convicted on December 8, 2008. DAVILA was sentenced to 6 months in jail, suspended.
- f. Springfield District Court, Docket No. 0823CR2025, charging two counts of receiving stolen motor vehicle, and possession / sale of motor vehicle parts with defaced VIN, for which DAVILA was convicted on March 3, 2009. DAVILA was placed on probation.

2. *TARGET PHONE 1 – Phone Number Ending 6609*

21. Investigators know that Rafael DAVILA is the user of a phone using a number ending in 6609, which I will refer to as TARGET PHONE 1.<sup>3</sup> Investigators obtained historical cell site location information (CSLI) for TARGET PHONE 1 and reviewed the cell towers utilized by TARGET PHONE 1

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<sup>3</sup> The listed subscriber of TARGET PHONE 1 is Rafael Davila (xx/xx/1988). Law enforcement has spoken to DAVILA on TARGET PHONE 1. In addition to the actual use of the phone number to contact DAVILA, investigators obtained records for a Google account [thepartcloud@gmail.com](mailto:thepartcloud@gmail.com) wherein DAVILA identified himself as the user of the account and listed TARGET PHONE 1. Investigators also reviewed records from eBay for a user account associated with [thepartcloud@gmail.com](mailto:thepartcloud@gmail.com) that lists Rafael DAVILA as the user and lists the phone number associated with the account as TARGET PHONE 1. DAVILA has listed TARGET PHONE 1 on a number of other documents including title and registration documents filed with the Mass. RMV.

proximate to the catalytic converter thefts, burglaries, and other thefts, throughout the region taking place in 2022 and 2023.

22. Review of the CSLI for TARGET PHONE 1 showed that TARGET PHONE 1 utilized cell towers in the vicinity of the locations of nearly all of the thefts described in this Affidavit on the nights of the thefts. Significantly, the locations of the thefts are generally over one hundred, and on some occasions over two hundred miles from Springfield, Massachusetts, which is the area where DAVILA, N. DAVILA, FONSECA, MARSHALL, FELIBERTY and OYOLA reside. As cell phones generally use cell towers within 5 miles from the location of the cell phone, the CSLI for the cell phones of the suspects is particularly probative of their participation in the thefts. Additionally, investigators were able to obtain engineering data kept by the cell phone carriers that yielded more definitive and frequent information concerning the network activity of the cellular phones. This engineering data was able to assist investigators in identifying the whereabouts of the suspects' phones at times relevant to the thefts under investigation.

### 3. *Maroon ACURA MDX*

23. Over the course of this investigation, DAVILA has been determined to be the operator of a MAROON ACURA MDX that was repeatedly used to commit the catalytic converter thefts. This MAROON ACURA MDX has been observed parked at DAVILA's residence on a daily basis for months and he has been observed operating it on numerous occasions. This MAROON ACURA MDX has been utilized to commit catalytic converter thefts from over 470 vehicles during 2022 and 2023. In the course of those thefts, the MAROON ACURA MDX has been observed to have multiple different license plates attached it, none of which are registered to this vehicle. The investigation has revealed that DAVILA has purchased and stolen multiple license plates in order to anonymize the MAROON ACURA MDX. A photograph of the MAROON ACURA MDX taken by DAVILA follows:



#### 4. *Data Derived from Cellular Phone*

24. During the course of the investigation, investigators were also able to obtain text messages between DAVILA and the other suspects. Those text messages are set forth below in context with the crime to which they relate. Additionally, investigators located text messages sent by DAVILA outlining the manner and means of how he commits the thefts, and the planning and preparation that goes into these crimes. For example, investigators located the following messages sent by DAVILA utilizing TARGET PHONE 1 (the phone number ending in 6609) to an individual utilizing a phone number ending in 3986 on May 16, 2022:<sup>4</sup>

I pay for gas, drinks and junk food almost \$100 per trip x 3 is \$300
I paid the EZpass tolls a couple weeks ago \$250
I pay \$50 a month for the app for the prices
I use my truck and my plate, I do all the planning, all the driving, charge batteries, buy material, I make sure we have what we need and I help you when I can running around jacking shit up, being the look out.
It was 4170 bro and I spent like \$800-\$900.
4170-900=3270\2 = 1635. I gave you 1500 brody
I really didn't keep that much more. I don't want to to feel like I'm being greedy bro

25. As made clear in these text messages, DAVILA outlines his leadership role in the conspiracy and the costs associated with the catalytic converter thefts that he pays for up front. As he states,

<sup>4</sup> Later that evening and into the following morning, DAVILA and another individual targeted Randolph, MA, and steal 12 catalytic converters. See below.

DAVILA pays for gas, drinks, and junk food that they need during the long nights cutting catalytic converters. The thieves utilize his “truck” – meaning the MAROON ACURA MDX -- and his “plate” – meaning his license plate, and DAVILA does “all the planning” and “all the driving.” DAVILA also emphasizes that he is the one pays for access to the online pricing application to determine the catalytic converters that are most valuable to steal (“pay \$50 a month for the app for the prices”). DAVILA also charges the batteries for the power tools and buys the other materials that they “need.” Lastly, DAVILA notes that he is the lookout and runs around helping when he can, assisting in jacking the cars up so the converters can be cut out more quickly.

26. Investigators also reviewed numerous “Notes” that DAVILA kept, which detailed the extensive criminal conspiracy that he orchestrated. These notes were meticulous in accounting for the dates and locations that he had targeted and also the number of catalytic converters that had been stolen, including the makes and models, and when they were dropped off. One such list showing activity from May 2022 until October 2022 follows.

Visited  
 Leominster  
 5-2-22 pri 5-4-22 truck  
  
 Natick Framingham 5-9-22 truck  
  
 Walpole 5-11-22 truck long strip  
  
 5-16-22 Randolph Braintree  
 Next day molding with a lot of Isuzu with cables  
  
 Exit 54 off 95 after Dave and busters opposite side of highway  
 Express kitchen Isuzu CT  
  
 5-18-22 Waltham and one pri in Watertown and the Malden  
 city trucks  
  
 6-6-22 New Bedford Taunton good not done  
  
 7-20-22 1800 junk Woburn gotta go back  
  
 7-20-22 Lynn shitty ghetto  
  
 7-25-22 Mansfield is burnt, some foxborough, Easton done,  
 Norton done, Taunton mostly done and hot  
  
 7-27-22 Norwood is hot stay away; stoneham done, Taunton  
 done for now  
  
 8-3-22 salisbury done, Newburyport done  
  
 8-15-22 Woburn still some left  
  
 8-16-22 got junk list  
  
 8-17-22 Plymouth.... Maybe stay away  
  
 8-22-22 Westwood Dedham Roxbury canton all done  
  
 Rbr  
  
 8-24-22 Chelmsford,north  
 Billerica,Billerica,Bedford,Burlington,north reading,  
 Wilmington, Middleton All done  
  
 8-29-22 Waltham, Watertown, south Peabody, Peabody All  
 done  
  
 8-31-22 Norfolk, Braintree, Hanover, Holbrook, Norwell,  
 rockland, Whitman  
  
 9-5-22 needham, west newton, Cambridge, Somerville,  
 Abington, Brockton  
  
 9-12-22 Allston/Boston, Roxbury, Weymouth, hingham,  
 Hanover, north pembroke, pembroke, hanson  
  
 9-14-22 Hudson, northborough, Marlborough,Norfolk,  
 Franklin, bellingham, hopedale, Milford  
  
 9-19-22 Woburn, Lexington, Bedford, action, west concord,  
 Sudbury  
  
 9-21-22 finished Woburn and Wilmington  
  
 10-1-22 Nashua nh, started Londonderry  
  
 10-5-22 Londonderry, south hooksett, Manchester nh

27. Investigators also located numerous notes setting forth the make, model and number of converters dropped off, the date of drop off, and the expected profits, and split of the proceeds. FBI's Cryptanalysis and Racketeering Records Unit reviewed the "notes" that were recovered that possess notations associated with catalytic converters, including quantities, descriptions, and values. According to the Cryptanalysis and Racketeering Records Unit, DAVILA's note files include at least 362 entries that reference approximately 1,755 catalytic converters for a total value of at least \$572,495. Two examples of the notes follow listing converter types and expected price totals:

The list	Last drop off 12-8-22
3 3LM 500ea \$1500	3 3LM 600 \$1800
1 9SM \$275	4 33501291-1 Isuzu 300 \$1200
2 regular torpedo 200ea \$400	4 Pri EA6 GD3 sticks 750 \$3000
1 4-biscuit torpedo 600	1 Re8 rea9 Corolla stick \$300
1 70/30 torpedo 400	1 Civ \$280
1 fat torpedo \$280	2 GM 6.0 125 \$250
26 isuzu 200ea \$5200	2 Unicorn GAT EAS stick 1250 \$2500
\$8655	1 4 biscuit w/damage \$600
	1 Isuzu 33501312-2 \$300
	1 Isuzu 33501312-3 \$300
3 3LM 500ea \$1500	
20 Isuzu 200ea \$4000	20 regular isuzu 200 \$4000
6 regular torpedo 200ea \$1200	6 regular torpedo 200 \$1200
\$6700	\$5200

## 5. Bank Records and Assets

28. Investigators know from review of records and surveillance, that DAVILA does not have legitimate employment and has not had legitimate employment for multiple years. Investigators reviewed records from Keybank for an account for which Rafael DAVILA is the sole signatory ending in account number 4075 (the 4075 ACCOUNT). In the account opening documents completed on May 15, 2019, DAVILA listed the 6609 phone number (TARGET PHONE 1), and stated that he was self-employed. Review of the records showed that DAVILA deposited \$38,750 in cash to the account during 2022.

29. Investigators also know that DAVILA has accumulated extensive cash and numerous motor vehicles through these crimes. In a message DAVILA sent in July 2021 (utilizing TARGET PHONE 1), he told his girlfriend: "My leg is good and my pockets are full and I live in feeding hills and I don't owe rent till next year and my cases are close and I have \$200k in assets. I'll be fine." DAVILA is believed to

title certain vehicles in the names of family members in order to conceal his ownership since he lacks a putative source of income.

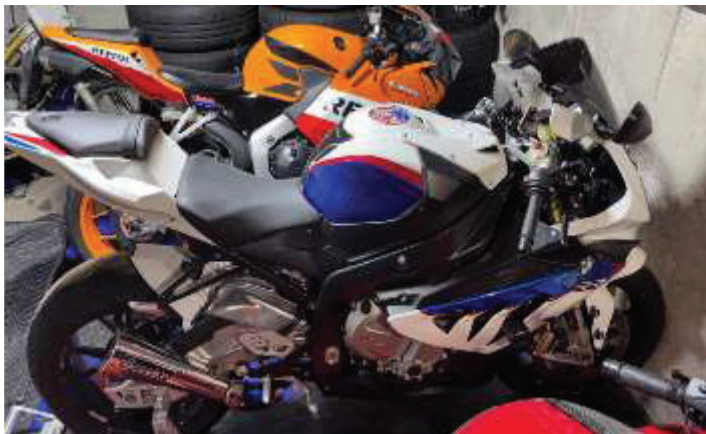
30. Among the vehicles identified to be acquired by DAVILA with the proceeds of the thefts are: a Dodge Challenger Hellcat, the Maroon Acura MDX, a black Chevrolet Suburban, a Honda Goldwing motorcycle, a Can-Am Spyder, and approximately six other motorcycles that are stored in DAVILA's basement (including a Husqvarna Supermoto, BMW S1000 RR, Orange Honda CBR1000 RR Sport, Red Suzuki GSX-R and a Can-Am Spyder). DAVILA is also believed to have accumulated large amounts of cash: as DAVILA would later tell his girlfriend, that he has cash stashed in his house ("I don't need good luck I have money in the bank I have money stashed in the house I have two beautiful kids I have everything I ever dreams for and I have good credit "). Images of the Dodge Challenger and Chevrolet Suburban and certain motorcycles follow:



DODGE CHALLENGER HELLCAT



CHEVROLET SUBURBAN



BMW S1000 RR



GSX-R



ORANGE CBR1000



CAN-AM SPYDER

**B. JOSE TORRES, a/k/a “GOLDY”, a/k/a “GOLDY TECH”**

31. I am familiar with Jose TORRES, a/k/a “GOLDY”, a/k/a “GOLDY TECH” (dob: xx/xx/1986, ssn: xxx-xx-2840). At all times since 2021, investigators know that TORRES resided at two residences located in Springfield, MA.

32. This investigation has revealed that TORRES is a middle-man in the monetization of the stolen catalytic converters. TORRES purchases stolen catalytic converters from thieves involved in cutting them out from the vehicles – the so-called cutters. According to the evidence in this case, including text messages, documents and observed transactions, TORRES buys large quantities of stolen catalytic converters and then monetizes them. Once in possession of the stolen catalytic converters, TORRES communicates with scrap dealers and other core purchasers who pay him an amount per catalytic converter. Through use of digital pricing applications, and communication with the core buyers, TORRES provides prices to the cutters. The prices can be identified by make and model of the vehicle from which the converter was taken, and by the code on the catalytic converter. TORRES then negotiates with the core buyer and delivers the catalytic converters to their facility. Over the time of the historical catalytic converter thefts detailed in this affidavit, TORRES is known to have transported thousands of catalytic converters to Connecticut, Rhode Island, New York, and New Jersey.

33. A photograph of TORRES from the Massachusetts RMV follows:



34. On January 14, 2021, TORRES filed a certificate of organization with the Massachusetts Secretary of State creating an entity named “Scrapguys413 LLC.” This entity lists TORRES as its resident agent and a principal office in Springfield, Massachusetts. The certificate of organization lists the general character of the business as “SCRAP METAL JUNK CARS RECYCLING CAT CONVERTERS BATTERIES ALTERNATORS N M ORE.” Investigators located a Facebook page for “Scrapguys413 LLC” located at <https://www.facebook.com/profile.php?id=100063907218541> (the “SCRAPGUYS413 FACEBOOK”). A post to the SCRAPGUYS413 FACEBOOK page on June 20, 2021, contains an advertisement with TORRES’ phone number ending in 5858 (TARGET PHONE 3), and indicates that the company buys “cat converters”, junk cars, batteries and more.

35. Investigators identified a Facebook account utilized by TORRES with the username “Goldy.Torres.357” (the TORRES FACEBOOK). On the TORRES FACEBOOK page, investigators identified several posts where TORRES advertises Scrapguys413 as “core byers” (sic). A post on the TORRES FACEBOOK from June 30, 2022, states “Just got back we ready to keep buying” and then contains the same advertisement image posted on the SCRAPGUYS413 FACEBOOK with TORRES’s phone number listed. Another post from January 26, 2022, to the TORRES FACEBOOK page contains the same advertisement image for Scrapguys413 and states “Paying dg price Scrapguys413 LLC”.<sup>5</sup> A screen capture of the image follows:

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<sup>5</sup> Investigators believe that the “dg price” is a reference to the price paid by DG AUTO, a New Jersey based core buying business that purchased bulk quantities of catalytic converters. Investigators know that DG AUTO in fact created a phone application that provided the price that would be paid based upon the make and model vehicle from which the catalytic converter was taken. The owner of DG AUTO, Navin Khanna, was charged in the Eastern District



36. While TORRES purports to have legitimate scrap business that he promotes online, he is aware that the catalytic converters he purchases are stolen. To start, investigators have not identified any instances in which TORRES obtains proof of ownership of the catalytic converters from the persons he buys them from. Additionally, he obtains bulk quantity of catalytic converters from DAVILA within days, and DAVILA himself has no purported legitimate source.

37. Apart from this, investigators obtained text messages between TORRES (utilizing the 5858 phone number) and numerous individuals concerning catalytic converters and methods of maximizing profits, which vehicles converters are most valuable, and the prospects for future precious metal prices. TORRES also advises on which vehicles to target and at times provide insight as to how to quickly cut the converter. One such conversation between TORRES (utilizing his phone number ending in 5858) and another individual (UNSUB 0870) follows:

Date	Author	Content
10/26/2021 3:27:08 AM	UNSUB 0870	Yerr
10/26/2021 6:56:14 AM	TORRES	What's good

of California and the Northern District of Oklahoma in relation to stolen catalytic converter and money laundering offenses.

10/26/2021 11:55:16 AM	UNSUB 0870	How much these worth f250 idk what year it is it looks like 2010 they got the sensor in the middle
10/26/2021 11:55:59 AM	TORRES	Those are cheap bro 140 a side
10/26/2021 12:13:31 PM	UNSUB 0870	Which ones are worth money they only bring 1 in the truck
10/26/2021 12:16:38 PM	TORRES	
10/26/2021 12:16:38 PM	TORRES	
10/26/2021 12:17:22 PM	TORRES	Got look like that 350+
10/26/2021 12:18:27 PM	TORRES	If is a 4 biscuit they can go for more 600 to 900 depending the number on it
10/26/2021 12:39:35 PM	UNSUB 0870	The truck that I seen yesterday had something that looked like that towards the middle of the truck
10/26/2021 12:39:46 PM	UNSUB 0870	Idk if those a cat too or nah
10/26/2021 12:41:34 PM	TORRES	It's around between the doors
10/26/2021 12:44:49 PM	UNSUB 0870	It was between the bed and doors big asf and then towards the front it was the other 2 cats
10/26/2021 12:45:58 PM	TORRES	Na if it got 2 in the front then that back thing a resonator
10/26/2021 12:46:30 PM	UNSUB 0870	Ohh
10/26/2021 2:57:36 PM	UNSUB 0870	What other cats worth money cause all the pickup trucks out here mostly land scappers use or construction company's but they like the newer pick up trucks
10/26/2021 2:57:54 PM	TORRES	Prius
10/26/2021 2:58:15 PM	UNSUB 0870	Hm they going for now
10/26/2021 2:58:50 PM	TORRES	9
10/26/2021 2:59:09 PM	UNSUB 0870	For each ?
10/26/2021 2:59:27 PM	TORRES	What u mean each
10/26/2021 2:59:50 PM	UNSUB 0870	Them shits come with 2 one in the middle and one next too headers
10/26/2021 2:59:52 PM	TORRES	They only got one stick
10/26/2021 3:00:05 PM	TORRES	No both lol 😊
10/26/2021 3:01:02 PM	TORRES	900 each I wish I be out here buying the hole car lol 😊
10/26/2021 3:01:11 PM	UNSUB 0870	Laughed at "900 each I wish I be out here buying the hole car lol 😊"
10/26/2021 3:01:55 PM	UNSUB 0870	That shit impossible too get both of em shits quick
10/26/2021 3:02:18 PM	UNSUB 0870	Cause isn't one of them closer too the headers

10/26/2021 3:03:21 PM	TORRES	Na it's easy af
10/26/2021 3:03:52 PM	TORRES	All u need it's a long extension and a 14
10/26/2021 3:04:48 PM	TORRES	And cut the back it cuts in one sec cuz the pipe small
10/26/2021 3:05:36 PM	UNSUB 0870	Oh so it's 2 14s and then 1 cut
10/26/2021 3:09:17 PM	UNSUB 0870	How much are pilots
10/26/2021 3:09:42 PM	TORRES	Yea
10/26/2021 3:10:03 PM	TORRES	Pilots suck not even worth cutting
10/26/2021 3:10:24 PM	TORRES	Unless it's 03 04 that got the big cat
10/26/2021 3:10:41 PM	UNSUB 0870	They gotta be something els worth money 🤔
10/26/2021 3:10:43 PM	TORRES	If is the lil Honda one there only 70\$
10/26/2021 3:11:06 PM	TORRES	Hyundai are ok 250 300
10/26/2021 3:11:20 PM	TORRES	Depends on the code
10/26/2021 3:12:34 PM	UNSUB 0870	Chacho ima just stick too Prius and the trucks but there's no more trucks like that anymore 🤔🤔🤔🤔
10/26/2021 3:14:57 PM	UNSUB 0870	Are these shits worth money or nah ?
10/26/2021 3:26:38 PM	TORRES	Na they got the same small ones u sent me
10/26/2021 3:27:31 PM	UNSUB 0870	Gay
10/26/2021 3:28:33 PM	TORRES	05 06 07 accord 4 to 600
10/27/2021 8:30:28 PM	UNSUB 0870	How much will the cats be going up if the market going sky rocket rn ?
10/27/2021 9:13:47 PM	TORRES	

38. I believe in this conversation, UNSUB 0870 asks TORRES what the prices are for catalytic converters that were taken from a Ford F250. TORRES responds that they are cheap and would only be worth \$140. UNSUB 0870 then asks which ones are more expensive, and TORRES responds with a picture of a truck and converter that he indicates are worth \$350 or more. TORRES then reiterates if it's a converter with four cores ("4 biscuit") it can go for \$600 to \$900. TORRES then tells UNSUB 0870 that Toyota Prius catalytic converters are expensive and are going for \$900 for both converters that the Priuses have on them. UNSUB 0870 then tells TORRES that it is impossible to get both converters from a Prius quickly ("That shit impossible too get both of em shits quick") and asks if one of the converters is located close to other components ("isn't one of them closer too the headers"). TORRES replies that is very easy ("easy af") to get them and you need a long extension on your saw and a 14 inch blade ("a long extension and a 14"). TORRES then informs UNSUB 0870 to "cut the back" because it cuts easily and the pipe is small ("cut the back it cuts in one sec cuz the pipe small"). UNSUB 0870 then asks the price for converters from a Honda Pilot, and TORRES responds that "Pilots suck" and are "not even worth cutting."

39. TORRES also engages in legal and illegal street racing and the tuning of automobiles. TORRES refers to himself and his Honda race car as “Goldy Tech.” Investigators have viewed publicly visible pictures of TORRES’s Honda hatchback race car and know it is equipped with thousands of dollars in aftermarket parts, computer systems, and upgrades, including a nitrous oxide system. Investigators know that TORRES has no legitimate source of income and believe that the proceeds of the catalytic converters sales have been used to pay for the upgrades, parts and systems on TORRES’s race car. A photograph of TORRES’s race car follows:



#### *1. Criminal Record*

40. I am familiar with Jose TORRES’ criminal history. TORRES currently is on pretrial release for two cases pending in Connecticut. Those cases are as follows:

- a. Connecticut Docket No. H14H-CR17-0174019-T, charging burglary 2<sup>nd</sup> degree, stealing a firearm, stealing a firearm, criminal mischief 3<sup>rd</sup> degree, and larceny 6<sup>th</sup> degree; and Connecticut Docket No. H14H-CR18-0176352-T, charging larceny 1<sup>st</sup> degree.
- I am familiar with the facts of these cases, as stated in the sworn arrest warrant application. The application indicated that a resident called 911 to report that men had forced their way into his residence in East Windsor, CT. The resident locked himself in a bedroom, and when police arrived they learned that two handguns had been stolen. A vehicle was described to police by the resident and it was soon located and stopped. TORRES was in the vehicle. In the vehicle, numerous articles of jewelry and property stolen from the residence were found. Along the roadside near the Audi’s path of travel, the two stolen firearms and other items stolen from the residence were found. The same vehicle was registered to a woman who utilized TORRES’ former residence, and a number of other burglaries were identified in Hampden, MA, and Longmeadow, MA, where the same vehicle was used.

41. TORRES’ criminal history lists the following pertinent convictions:

- a. Hampden Superior Court, Docket No. 1379CR00851, charging Possession to Distribute a Class A substance, for which TORRES was convicted on April 27, 2015. TORRES was sentenced to 2 to 3 years in state prison.
- b. Springfield District Court, Docket No. 1323CR3896, charging Receipt of Stolen Property, for which TORRES was convicted on August 7, 2013. TORRES was sentenced to 120 days in jail.
- c. Holyoke District Court, Docket No. 1117CR1979, charging Breaking and Entering in the Night to Commit a Felony, for which TORRES was convicted on February 12, 2013. TORRES was placed on probation, which he violated and was sentenced to 6 months in jail.
- d. Springfield District Court, Docket No. 0623CR12148, charging Altering VIN on Motor Vehicle, and Receiving Stolen Motor Vehicle, for which TORRES was convicted on February 13, 2009. TORRES was sentenced to 3 months in jail.

**C. NICOLAS DAVILA**

42. I am familiar with Nicolas DAVILA (dob xx/xx/1997, ssn: xxx-xx-6839) (N. DAVILA or Nicolas DAVILA), who is the brother of Rafael DAVILA. Nicolas DAVILA has been identified to be the user of a phone ending in 0421 (TARGET PHONE 6). Throughout the course of this investigation and the entirety of 2022, Nicolas DAVILA resided in Springfield, Massachusetts. Nicolas DAVILA participated in catalytic converter thefts with Rafael DAVILA on at least November 24, 2022, November 27, 2022, and December 6, 2022.

43. A photograph of Nicolas DAVILA from the Massachusetts RMV follows:



*1. Criminal Record*

44. I am familiar with Nicolas DAVILA's criminal history, which lists the following pertinent adjudications:

- a. Springfield District Court, Docket No. 1623CR002986, charging Assault and Battery on a Police Officer and Resisting Arrest, for which Nicolas DAVILA admitted sufficient facts and the case was continued without a finding on January 30, 2019. Nicolas DAVILA was placed on probation for one year, and the case was dismissed.
- b. Springfield District Court, Docket No. 1623CR002986, charging Negligent Operation, for which Nicolas DAVILA admitted sufficient facts and the case was continued without a finding on September 9, 2022. Nicolas DAVILA was placed on probation for one year and is currently under supervision.

2. *TARGET PHONE 6 – Phone Number Ending in 0421*

45. Investigators obtained the records for a phone number ending in 0421 (TARGET PHONE 6). This phone number is registered to an individual who is believed to be Rafael DAVILA and Nicolas DAVILA's father, with whom Nicolas DAVILA is believed to reside. Nicolas DAVILA is the user of TARGET PHONE 6. Investigators base this attribution of TARGET PHONE 6 to Nicolas DAVILA, in part, from review of text messages between Rafael DAVILA (utilizing TARGET PHONE 1) and Nicolas DAVILA (utilizing TARGET PHONE 6). In the iCloud data for R. DAVILA's iCloud account, TARGET PHONE 6 is associated with a contact named "Nic" and the text messages discuss content consistent with being brothers. Additional attribution is based upon review of historical CSLI for TARGET PHONE 6 and comparison to surveillance video during the night of certain thefts, which depict Nicolas DAVILA in the area of where the historical CSLI places TARGET PHONE 6.

46. Investigators reviewed text messages between Nicolas DAVILA (utilizing TARGET PHONE 6) and Zachary MARSHALL (utilizing TARGET PHONE 7) where they discuss the monetization of stolen catalytic converters. During the conversation, Nicolas DAVILA and MARSHALL make reference to "Goldy", which is TORRES, and that he has to make a cut from their sale of converters as well ("He gotta" "eat" "too").

Date	Author	Content
5/27/2022 12:30:33 AM	MARSHALL	He hit you back ?
5/27/2022 12:48:10 AM	N. DAVILA	Yeah them trucks went down
5/27/2022 12:48:30 AM	MARSHALL	How much they said though
5/27/2022 12:48:45 AM	N. DAVILA	I forgot under 3 tho like 2 someshit bro
5/27/2022 12:48:46 AM	N. DAVILA	No cap
5/27/2022 12:48:53 AM	N. DAVILA	280 if I'm right

5/27/2022 1:10:27 AM	MARSHALL	Ohh ok
5/27/2022 1:11:46 AM	N. DAVILA	Yeah why what your man's said?
5/27/2022 1:12:07 AM	MARSHALL	He just told me he checked and they just went up
5/27/2022 1:16:37 AM	N. DAVILA	When? I was just with him
5/27/2022 1:17:02 AM	MARSHALL	Nah he looked on some page I guess idk
5/27/2022 1:17:26 AM	N. DAVILA	Oh idk but it's what goldy saying he the one paying feel me
5/27/2022 1:17:30 AM	N. DAVILA	He gotta way too
5/27/2022 1:17:31 AM	N. DAVILA	Way
5/27/2022 1:17:34 AM	N. DAVILA	Eat ***
5/27/2022 1:18:27 AM	MARSHALL	Nah I know

#### **D. CARLOS FONSECA, a/k/a "CHARLITO"**

47. I am familiar with Carlos FONSECA, a/k/a "CHARLITO" (dob xx/xx/1990, ssn: xxx-xx-7130). Throughout the course of this investigation and the entirety of 2022, FONSECA resided in Massachusetts. Carlos FONSECA participated in catalytic converter thefts with Rafael DAVILA on at least August 23, 2022, August 25, 2022, August 30, 2022, September 1, 2022, September 6, 2022, September 8, 2022, September 13, 2022, September 15, 2022, September 20, 2022, September 22, 2022, October 2, 2022, and October 4, 2022.

48. A photograph of FONSECA from the Massachusetts RMV follows:



##### *1. Criminal Record*

49. I am familiar with Carlos FONSECA's criminal history. FONSECA's criminal history lists the following pertinent convictions:

- a. Hampden Superior Court, Docket No. 1379CR01395, charging Assault and Battery Dangerous Weapon, to wit: Tire Iron, for which FONSECA was convicted on November 19, 2014. FONSECA was sentenced to 2 years, 1 year to serve, balance suspended for two years.

- b. Holyoke District Court, Docket No. 1117CR001858, charging Assault and Battery, Threats, and Destruction of Property, for which FONSECA admitted to sufficient facts. The case was continued without a finding for one year of probation.

2. *TARGET PHONE 8 – Phone Number Ending in 4001*

50. Investigators reviewed records for a phone number ending in 4001, believed to be utilized by FONSECA (“TARGET PHONE 8”). Those records listed Carlos FONSECA as the subscriber for the phone, and listed an activation date of August 8, 2022, and termination date of October 13, 2022.

**E. ZACHARY MARSHALL**

51. I am familiar with Zachary MARSHALL (dob xx/xx/1997, ssn: xxx-xx-0642). Throughout the course of this investigation and the entirety of 2022, MARSHALL resided in Massachusetts. MARSHALL participated in catalytic converter thefts with Rafael DAVILA on at least January 19, 2023, January 31, 2023, February 9, 2023, February 16, 2023, February 28, 2023, March 7, 2023, and March 9, 2023. DAVILA and MARSHALL were also identified as committing a burglary of a storage unit facility on February 2, 2023.

52. A photograph of MARSHALL from the Massachusetts RMV follows:



1. *Criminal Record*

53. I am familiar with Zachary MARSHALL’s criminal history. MARSHALL’s criminal history lists the following pertinent conviction:

- a. Connecticut Docket No. T19R0CR18-0112664-S, charging Burglary 2<sup>nd</sup> Degree, for which MARSHALL was found guilty on November 6, 2018. MARSHALL was sentenced to 5

years in jail, 1 year suspended, and three years of probation. MARSHALL is believed to still be on probation for this case.

- b. Springfield District Court, Docket No. 1723CR004103, Possession of a Firearm Without a License, Resisting Arrest, and Possession of a Class B Substance with Intent to Distribute, for which MARSHALL was found guilty on May 4, 2018. MARSHALL was sentenced to 15 months in jail and a period of probation, which he violated.
- c. Springfield District Court, Docket No. 1623CR000443, charging Larceny from a Person, for which MARSHALL admitted sufficient facts and the case was continued without a finding on October 14, 2016. MARSHALL was placed on probation for two years, which he violated multiple times.

2. *TARGET PHONE 7 – Phone Number Ending in 9737*

54. Investigators obtained records for a phone number ending in 9737 (“TARGET PHONE 7”). The subscriber for TARGET PHONE 7 is a woman who is believed to be MARSHALL’s girlfriend. Investigators obtained Apple records for TARGET PHONE 7, and Zachary MARSHALL is listed as the user of the iCloud account associated with TARGET PHONE 7. Investigators also attribute TARGET PHONE 7 to MARSHALL through review of text messages between DAVILA (utilizing TARGET PHONE 1) and MARSHALL (using TARGET PHONE 7), where MARSHALL self-identifies during the conversation.

55. Investigators have reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and MARSHALL (utilizing TARGET PHONE 7) where they discuss the process of transporting and monetizing the stolen catalytic converters, and the sale of stolen catalytic converters to dealers located outside of Massachusetts, and to TORRES (referred to as “Goldy”). These text messages are set forth in APPENDIX A to this affidavit.

**F. SANTO FELIBERTY**

56. I am familiar with Santo FELIBERTY (dob: xx/xx/1989, ssn: xxx-xx-2241). Throughout the course of this investigation and the entirety of 2022 and 2023, FELIBERTY resided in Massachusetts. FELIBERTY participated in catalytic converter thefts with DAVILA on at least December 21, 2022, January 5, 2023, January 9, 2023, and January 26, 2023. DAVILA, FELIBERTY, and Alex OYOLA also committed a bank theft on December 8, 2023, and conspired to commit additional bank thefts on December

13, 2022, and December 15, 2022. DAVILA, FELIBERTY and Alex OYOLA also committed two jewelry store burglaries on January 11, 2023, and a theft of a trailer and snowblowers on December 14, 2022.

57. A photograph of FELIBERTY from the Massachusetts RMV follows:



*1. Prior Criminal Record*

58. I am familiar with Santo FELIBERTY's criminal history. FELIBERTY's criminal history lists the following pertinent convictions:

- a. Connecticut Docket No. H14H-CR13-0665002-S, charging Larceny 1<sup>st</sup> degree, and Burglary 3<sup>rd</sup> degree, for which FELIBERTY was convicted, and sentenced on January 1, 2014. FELIBERTY was sentenced to 8 years in jail, 3 years suspended, and 3 years of probation. Based on review of police reports related to this conviction, investigators believe that this conviction is related to a string of jewelry store burglaries committed in connection with DAVILA and OYOLA.
- b. Connecticut Docket No. H14H-CR14-0672117-S, charging Larceny 2<sup>nd</sup> degree, for which FELIBERTY was convicted, and sentenced on October 16, 2014. FELIBERTY was sentenced to 8 years in jail, 2 years suspended, and 3 years of probation. Based on review of police reports related to this conviction, investigators believe that this conviction is related to a string of jewelry store burglaries committed in connection with DAVILA and OYOLA.
- c. Connecticut Docket No. H13W-CR10-0154690-S, charging Assault Personnel, for which FELIBERTY was convicted, and sentenced on March 23, 2011. FELIBERTY was sentenced to 3 years in jail, 90 days suspended and 3 years of probation.
- d. Connecticut Docket No. H13W-MV10-0323156-S, charging Run From Police, for which FELIBERTY was convicted and sentenced on March 23, 2011. FELIBERTY was sentenced to 90 days in jail.

*2. TARGET PHONE 5 – Phone Number Ending in 9926*

59. Investigators know FELIBERTY to use a phone number ending in 9926 ("TARGET PHONE 5"). The subscriber records for TARGET PHONE 5 (860-712-9926) show that the financially

liable party is a woman believed to be FELIBERTY's sister. FELIBERTY listed TARGET PHONE 5 for an eBay account named "Santo860" for which he was the user. Review of DAVILA's telephone contacts showed that TARGET PHONE 5 was associated with a contact named "Santo Biz", consistent with FELIBERTY's name. Records obtained from Apple show that FELIBERTY is the listed user of an iCloud account associated with TARGET PHONE 5. Therefore, based upon review of call detail records, and other evidence in this case, FELIBERTY is believed to be the actual user of TARGET PHONE 5. Based upon review of historical CSLI, investigators believed that FELIBERTY generally powers down TARGET PHONE 5 or leaves TARGET PHONE 5 at home during thefts and burglaries, opting instead to bring an anonymous burner phone, TARGET PHONE 10, to facilitate communication during the crimes.

### 3. *TARGET PHONE 10 – Phone Number Ending in 7553*

60. Investigators know FELIBERTY to be the user of a phone number ending in 7553 ("TARGET PHONE 10"). The subscriber records for TARGET PHONE 10 show that it is a prepaid phone activated on May 24, 2022. The listed subscriber is a fictitious individual with false information: "James Franco" – the name of a famous actor -- with an address of 50 Holyoke Street, Holyoke – the address of the Holyoke Mall<sup>6</sup> – and non-functional contact phone numbers (111-111-0001, and 111-111-0002) and email address ([NA23@GMAIL.COM](mailto:NA23@GMAIL.COM)). Based on that review, investigators believe that TARGET PHONE 10 is a prepaid anonymous "burner" cellular phone utilized by FELIBERTY during the commission of the crimes described in this affidavit.<sup>7</sup>

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<sup>6</sup> Of note, CSLI for TARGET PHONE 5 utilized by FELIBERTY shows that it utilized cell towers in the vicinity of the Holyoke Mall on May 23, 2022, which is the day before TARGET PHONE 10 was activated. Review of text messages for TARGET PHONE 5, show that FELIBERTY discusses the purchase of a phone on or about this date.

<sup>7</sup> Specifically, investigators have identified that FELIBERTY's number ending in 9926 (TARGET PHONE 5) is utilized in the hours before and after thefts to coordinate meetings and distribution of profits, but that it registers no network activity outside of Springfield, MA during the thefts. By comparison, investigators have identified text message conversations between DAVILA (utilizing TARGET PHONE 1) and FELIBERTY (utilizing TARGET PHONE 5) for meetings and TARGET PHONE 10 actually shows network activity consistent with FELIBERTY travelling to DAVILA's residence. Furthermore, investigators have reviewed the historical CSLI for TARGET PHONE 10 and determined that TARGET PHONE 10 utilizes cell towers consistent with participation in the thefts, for which text message conversations show that FELIBERTY participated. Consequently, investigators believe that FELIBERTY uses both TARGET PHONE 5 and TARGET PHONE 10 and brings TARGET PHONE 10 along with him during the commission of the crimes, while leaving TARGET PHONE 5 behind or powering it down. Of note,

61. Investigators conducted a first and last call analysis of cell towers utilized by TARGET PHONE 10 during the period of November 28, 2022 through February 28, 2023.<sup>8</sup> During that period the most frequently used cell tower for the first and last call made by TARGET PHONE 10 was located in Springfield, MA, approximately 3000 feet from a Parker Street residence that is associated with FELIBERTY. A first and last call analysis of TARGET PHONE 5 during the same period revealed that TARGET PHONE 5 utilized the same cell tower in Springfield, MA, approximately 3000 feet from a Parker Street residence that is associated with FELIBERTY.

62. Additionally, records show that communications between TARGET PHONE 1 and TARGET PHONE 10 take place during the time in which DAVILA and FELIBERTY were travelling to/from or were committing the crimes described in this affidavit. Review of text messages shows that FELIBERTY utilizes TARGET PHONE 5 to coordinate meetups with DAVILA prior to setting out to commit the crimes and then is believed to utilize the anonymous TARGET PHONE 10 during the commission of the crimes.

**G. ALEX OYOLA, a/k/a “DIRTY”**

63. I am familiar with Alex OYOLA, a/k/a “DIRTY”, a/k/a “D” (dob xx/xx/1986, ssn: xxx-xx-3365). Throughout the course of this investigation and the entirety of 2022 and 2023, OYOLA is known to reside in Massachusetts. DAVILA, FELIBERTY, and Alex OYOLA committed a bank theft on December 8, 2023, and conspired to commit additional bank thefts on December 13, 2022, and December 15, 2022. DAVILA, FELIBERTY and Alex OYOLA also committed two jewelry store burglaries on January 11, 2023, and a theft of a trailer and snowblowers on December 14, 2022.

64. A photograph of OYOLA from the Massachusetts RMV follows:

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there are no contacts between TARGET PHONE 5 and TARGET PHONE 10, suggesting that the same user employed both numbers.

<sup>8</sup> A first and last call analysis considers the first and last cell tower utilized by a phone during the day. This type of analysis is used to assist in identifying the area of a residence based on the principal that an individual will make their first and last call from their residence and therefore utilize cell towers in the area of their residence.



*1. Prior Criminal Record*

65. I am familiar with Alex OYOLA's criminal history. OYOLA's criminal history lists the following pertinent convictions:

- a. Connecticut Docket No. FBT -CR10-0247125-T, charging Robbery 1<sup>st</sup> Degree, for which OYOLA was convicted, and sentenced on August 1, 2010. OYOLA was sentenced to 14 years in jail, 7 years suspended, and 5 years of probation. Based on review of related reports, investigators believe that this conviction is related to a series of jewelry store robberies that are believed to have involved DAVILA and FELIBERTY. As noted above, FELIBERTY was convicted of separate jewelry store incidents.

*2. TARGET PHONE 9 – Phone Number Ending in 9355*

66. Investigators reviewed records for a phone number ending in 9355, believed to be utilized by Alex OYOLA ("TARGET PHONE 9"). Those records listed a "Concepcion Cruzado" as the subscriber for the phone and listed an address on Saint James Avenue in Springfield, MA that matches OYOLA's residence specified in records obtained from the Mass. RMV. Based upon review of historical CSLI for TARGET PHONE 9 and the absence of network activity during the commission of the crimes, investigators believe that OYOLA either powers down or places TARGET PHONE 9 into airplane mode during the commission of the crimes. FELIBERTY has frequent contact with TARGET PHONE 9 and has TARGET PHONE 9 associated with a contact name "Durrty" (meaning "Dirty"), which investigators believe is OYOLA's street-name. FELIBERTY and DAVILA also engage in a three-way text message conversation with TARGET PHONE 9 where the user of TARGET PHONE 9 is referred to by FELIBERTY as "Alex."

67. Investigators have reviewed records of recent motor vehicle purchases and title documents submitted by OYOLA to the Mass. RMV. In a bill of sale for motor vehicle purchase on December 19,

2022, OYOLA listed TARGET PHONE 9 as his phone number. Additionally, OYOLA submitted TARGET PHONE 9 as his phone number on an application for registration and title submitted to the Mass. RMV on September 13, 2022.

## **V. REGIONAL CATALYTIC CONVERTER THEFTS**

68. As noted above, during 2022 law enforcement officers throughout Massachusetts and New Hampshire identified a large number of catalytic converter thefts for which the MAROON ACURA MDX was involved. These incidents involved at least two suspects wearing dark clothing, who would target residential and commercial vehicles. The suspects were able to locate and cut away the catalytic converters from a vehicle within one minute in most instances. The suspects utilized battery operated power-tools, specifically reciprocating saws to cut the converters from the exhaust systems. Some vehicles needed to be jacked up in order to access the catalytic converters and the suspects would promptly place the jack under the vehicle, raise it, cut the catalytic converter, stow it in the rear of the MAROON ACURA MDX and move on.

69. Given the frequency of the thefts involving this vehicle, it was plain to investigators that these crimes were being committed by professional thieves who were technically skilled and knowledgeable about motor vehicles. These thefts bore the hallmarks of discipline, planning and preparation and it appeared that the same suspects, or group of suspects were involved in the growing number of offenses. Additionally, the nature of the crime required a means to monetize the stolen property as there is a limited marketplace for the resale of stolen catalytic converters.

70. Investigators obtained the records and related information for those thefts and compared them to the historical CSLI of the suspects telephones where applicable. Investigators were also able to obtain historical GPS tracking data for the MAROON ACURA MDX from December, 2022, onward, which allowed investigators to specifically identify catalytic converter thefts in which the MAROON ACURA MDX was utilized. Investigators also obtained text messages, notes, photographs and other digital evidence generated by the suspects on their cellular phones. These text messages and other digital evidence captured the suspects preparing for, communicating about, and committing the crimes.

71. Through these investigative techniques, the following catalytic converter theft incidents were identified to have been committed by DAVILA, and at least one additional coconspirator, who, where possible, was identified in the narrative description below. Investigators estimate that the costs to repair attributable to these thefts exceed \$2,000,000.<sup>9</sup>

<b>Date</b>	<b>Location</b>	<b>Number of Vehicles Stolen From</b>
3/7/2022	Sturbridge, MA	6
3/8/2022	Milford, MA	8
3/10/2022	Norwell, MA	5
3/25/2022	Wilmington, MA	6
3/27/2022	Millbury, MA	22
5/5/2022	Leominster, MA	10
5/10/2022	Holliston, MA	10
5/12/2022	Norwood, MA	11
5/12/2022	Walpole, MA	3
5/12/2022	Sharon, MA	7
5/17/2022	Randolph, MA	12
5/19/2022	Watertown, MA	1
5/19/2022	Medford, MA	14
5/19/2022	Malden, MA	6
7/21/2022	Lynn, MA	3
7/21/2022	Wilmington, MA	12
7/26/2022	Easton, MA	6
7/28/2022	Norwood, MA	2
7/28/2022	Woburn, MA	3
8/4/2022	Beverly, MA	2
8/16/2022	Woburn, MA	26
8/18/2022	Carver, MA	2
8/18/2022	Plymouth, MA	6
8/23/2022	Canton, MA	3
8/25/2022	Middleton, MA	1
8/30/2022	Peabody, MA	3
8/30/2022	Waltham, MA	10
9/1/2022	Hingham, MA	3
9/1/2022	Norwell, MA	1
9/6/2022	Easton, MA	1
9/8/2022	Chelmsford, MA	1
9/13/2022	Hanover, MA	1
9/13/2022	Hingham, MA	2
9/13/2022	Pembroke, MA	12
9/15/2022	Bellingham, MA	2

<sup>9</sup> This estimate assumes a \$5,000 cost to repair per vehicle, which as discussed is a conservative estimate and would be far below the documented costs of more than \$10,000 to repair certain vehicles such as larger trucks that have multiple catalytic converters.

9/15/2022	Franklin, MA	5
9/15/2022	Hudson, MA	6
9/20/2022	Sudbury, MA	1
9/21/2022	Wilmington, MA	5
9/22/2022	Woburn, MA	5
10/2/2022	Ipswich, MA	10
10/2/2022	Methuen, MA	8
10/2/2022	Billerica, MA	10
10/4/2022	Londonderry, NH	13
11/24/2022	Hooksett, NH	14
11/27/2022	Wilmington, MA	10
11/27/2022	Millbury, MA	3
12/6/2022	Bow, NH	1
12/6/2022	Concord, NH	14
12/21/2022	Manchester, NH	1
12/29/2022	Easthampton, MA	2
12/29/2022	Holyoke, MA	1
1/5/2023	Framingham, MA	9
1/9/2023	Worcester, MA	13
1/19/2023	Fitchburg, MA	8
1/19/2023	Leominster, MA	1
1/26/2023	Abington, MA	10
1/26/2023	Weymouth, MA	2
1/30/2023	Shrewsbury, MA	16
2/9/2023	Wilmington, MA	1
2/9/2023	Woburn, MA	13
2/16/2023	Marlborough, MA	1
2/16/2023	Northborough, MA	4
2/28/2023	Auburn, MA	2
2/28/2023	Millbury, MA	7
3/7/2023	Wilmington, MA	3
3/7/2023	Woburn, MA	2
3/7/2023	Hudson, MA	1
3/7/2023	Burlington, MA	4
3/9/2023	Auburn, MA	3
3/9/2023	Bedford, MA	2
3/9/2023	Billerica, MA	4
3/16/2023	Sterling, MA	20
3/21/2023	Leominster, MA	13
	<b>Total</b>	<b>471</b>

72. The list set forth above and incidents recited below, reflect those incidents where (1) surveillance video was able to identify a vehicle matching the MAROON ACURA MDX as being involved, (2) specific GPS tracking information placed the MAROON ACURA MDX at the location of the thefts,

(3) text messages and other digital evidence between the suspects substantively proving their involvement in the thefts, and/or (4) historical CSLI that either placed a suspect in the vicinity of the thefts, or cannot otherwise place them elsewhere at the time of the thefts. Lastly, this list only includes thefts taking place starting in 2022. Thus, a large number of catalytic converter theft incidents known to investigators were excluded. Investigators also know that a large number of thefts have not been identified or were not reported to police and those incidents are also not included.

**A. 3/1/22, Sturbridge, MA**

73. According to Sturbridge Police Report 232-53-OF, on or about March 1, 2022, Sturbridge Police received reports of catalytic converter thefts. Based upon review of the reports, a total of six vehicles were targeted and had their catalytic converters stolen. According to the report, Sturbridge Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts that took place at approximately 11:50 PM on February 28, 2022, and 12:30 AM on March 1, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video recovered by Sturbridge Police follows:



74. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incident.

- a. TARGET PHONE 1 utilized a cell tower in Franklin, MA, at 11:46 PM, and, at 12:14 AM on February 28, 2022, and 12:15 AM on March 1, 2022. The cell tower utilized by TARGET PHONE 1 is approximately 1.25 miles from the location of the thefts in Sturbridge, MA.

**B. 3/8/22, Milford, MA**

75. According to Milford Police Report 22-11053-OF, on or about March 8, 2022, Milford Police received a report of catalytic converter thefts. Based upon review of the reports, a total of eight vehicles were targeted and had their catalytic converters stolen. According to the report, Milford Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 11:38 PM on March 7, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Still images recovered the surveillance video recovered by Milford Police follow:



76. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incident.

- a. From 8:11 PM to 8:53 PM on March 7, 2022, TARGET PHONE 1 utilized cell towers consistent with travel eastbound from Westfield, MA, to the area of Ludlow, MA. TARGET PHONE 1 utilized a tower in the vicinity of I-90, at 8:53 PM on March 7, 2022.
- b. During the period of 8:53 PM on March 7, 2022, through 9:53 AM on December 8, 2022, TARGET PHONE 1 was conspicuously off the network and registered no network activity.
- c. At 9:53 AM on March 8, 2022, TARGET PHONE 1 utilized a cell tower located approximately 1 mile from DAVILA's residence in 799 S. West Street, Feeding Hills, MA.

**C. 3/10/22, Norwell, MA**

77. According to Norwell Police Reports 22NOW-115-OF and 22NOW-116-OF, Norwell Police received reports of several catalytic converter thefts that were determined to have taken place on or about March 10, 2022. Based upon review of the reports, a total of five vehicles were targeted and had their catalytic converters stolen. According to the report, Norwell Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 3:41 AM on March 10, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video recovered by Norwell Police follows:



78. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incident.

- a. TARGET PHONE 1 utilized a cell tower in Chicopee, MA, at 9:13 PM on March 9, 2022.
- b. During the period of 9:13 PM on March 9, 2022, through 8:05 PM on March 10, 2022, TARGET PHONE 1 was conspicuously off the network and registered no network activity.
- c. TARGET PHONE 1 utilized a cell tower located in Chicopee, MA At 11:42 AM on March 10, 2022.

**D. 3/25/22, Wilmington, MA**

79. According to Wilmington Police Report 22-368-OF, on or about March 25, 2022, Wilmington Police received a report of catalytic converter thefts. According to the report, at 1:25 AM on March 25, 2022, Wilmington Police also engaged in a chase of a maroon color SUV that was identified to be in the parking lot, where the catalytic converters would later be reported stolen. According to the report, a total of five vehicles were targeted and had their catalytic converters stolen. This vehicle is consistent with the MAROON ACURA MDX.

80. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incident.

- a. TARGET PHONE 1 utilized a cell tower in Woburn, MA at 6:01 AM, and 6:23 PM on March 25, 2022. This cell tower is approximately 1300 feet from the location of the thefts in Wilmington, MA.

**E. 3/27/22, Millbury, MA**

81. According to Millbury Police Report 22-157-OF on or about March 27, 2022, Millbury Police received reports of catalytic converter thefts. Based upon review of the reports, a total of twenty-two (22) vehicles had their catalytic converters stolen. According to the report, Millbury Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 11:47 PM on March 26, 2022, to 2:22 AM on March 27, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from the surveillance video recovered by Millbury Police follows:



82. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incident.

- a. TARGET PHONE 1 utilized a cell tower in Worcester, MA on March 27, 2022, at 2:04 AM. The cell tower is approximately 2000 feet from the location of the thefts in Millbury, MA.

**F. 5/5/22, Leominster, MA**

83. According to Leominster Police Reports 22-18983-OF, 22-19052-OF, 22-19054-OF, 22-19058-OF, 22-19067-OF, 22-19075-OF, 22-19105-OF, 22-19115-OF, on or about May 5, 2022, Leominster Police received reports of catalytic converter thefts. Based upon review of the reports, at least ten motor vehicles were targeted and had their catalytic converters cut out and stolen. According to the reports, Leominster Police recovered surveillance video footage in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately around 2:20 AM on May 5, 2022. According to the reports, this vehicle appeared to match the description of the MAROON ACURA MDX. A still image from the surveillance video recovered by Leominster Police follows:



84. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incident.

- a. TARGET PHONE 1 utilized cell towers in Leominster, MA at 1:59 PM, and 11:49 PM on May 4, 2022. The cell towers are within 2.5 miles from the locations of the thefts in Leominster, MA.

85. Investigators reviewed a “Note” drafted by Rafael DAVILA on his cellular phone, which was last modified on February 2, 2023 (set forth above). This note appears to be a ledger of historical thefts. In the note, DAVILA wrote, “Leominster 5-2-22 pri 5-4-22 truck”. Investigators believe this is a note written by DAVILA memorializing the catalytic converters stolen by date and location. This note indicates the town – Leominster, a date of “5-2-22” where he stole a catalytic converter from a “pri” meaning Toyota Prius, and a second date of “5-4-22” where he targeted trucks. Of note, the catalytic converter thefts reported in Leominster Police Report 22-19052 were from four trucks parked at a construction business. The date of May 4, 2022, is consistent with when DAVILA would have left his home in the Springfield area to commit the thefts into the morning of May 5, 2022.

**G. 5/10/22, Holliston, MA**

86. According to Holliston Police Reports 22-422-OF, 22-423-OF, 22-424-OF, and 22-426-OF, on or about May 10, 2022, Holliston Police received reports of a catalytic converter theft. Based upon review of the reports, ten vehicles were targeted and had their catalytic converters stolen. According to the report, Holliston Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 2:31 AM on May 10, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video recovered by Holliston Police follow:



87. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incident.

- a. TARGET PHONE 1 utilized a cell tower in Holliston, MA at 1:51 AM on May 10, 2022. This cell tower is located within 1 mile from the location of the thefts in Holliston, MA.

**H. 5/12/22, Norwood, MA, Walpole, MA, and Sharon, MA**

88. According to Norwood Police Reports 22-541-OF, 22-543-OF, 22-546-OF, 22-553-OF, and 22-560-OF, on or about May 12, 2022, Norwood Police received reports of catalytic converter thefts. Based upon review of the reports, eleven vehicles were targeted and had their catalytic converters cut out and stolen. According to the report, Norwood Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 3:23 AM on May 12, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from the surveillance video recovered by Norwood Police follows:



89. According to Sharon Police Report 22SHA-10008-OF, on or about May 12, 2022, Sharon Police received a report of catalytic converter thefts. The victim in this incident was a company named Next Day Moulding LLC. Based upon review of the reports, seven vehicles were targeted and had their catalytic converters stolen. According to the report, Sharon Police recovered surveillance video in the area of the thefts and were able to identify a small SUV involved in the thefts at approximately 4:00 AM on May 12, 2022. This vehicle appears to match the description of the MAROON ACURA MDX.

90. According to Walpole Police Reports 22WAL-581-OF, 22WAL-582-OF, 22WAL-589-OF, on or about May 12, 2022, Walpole Police received reports of catalytic converter thefts. Based upon review of the reports, three vehicles had their catalytic converters cut out and stolen. According to the report, Walpole Police recovered surveillance video in the area of the thefts and were able to identify an Acura SUV involved in the thefts. The vehicle was observed on surveillance video in the area at 12:31 AM, and 1:28 AM on May 12, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from the surveillance video recovered by Walpole Police follows:



91. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Walpole, MA from 12:51 AM to 1:10 AM on May 12, 2022. This cell tower is approximately 1.2 miles from the location of the thefts in Sharon, MA. This cell tower is approximately 1000 feet from a location of the thefts in Walpole, MA.

- b. TARGET PHONE 1 utilized cell towers in Norwood, MA from 1:27 AM to 3:27 AM on May 12, 2022. The cell towers were within 1.5 miles of the location of the thefts in Norwood, MA.

92. Investigators reviewed a “Note” drafted by Rafael DAVILA on his cellular phone, and observed a note that was last modified on February 2, 2023. This note appears to be a ledger of historical thefts. In the note, DAVILA wrote, “Walpole 5-11-22 truck long strip”. Investigators believe this is a note written by DAVILA memorializing the catalytic converters stolen by date and location. This note indicates the town – Walpole, a date of “5-11-22” where he targeted trucks. Of note, the catalytic converter thefts reported in Norwood, Sharon, and Walpole were from trucks. The date of May 11, 2022, would be consistent with when DAVILA would have left his home in the Springfield area to commit the thefts into the morning of May 12, 2022.

93. Another line of the “Note” drafted by DAVILA stated, “Next day molding with a lot of Isuzu with cables”. Of note, the victim in Sharon, MA was a business named “Next Day Moulding LLC”, consistent with DAVILA memorializing the business and success in stealing valuable catalytic converters.

94. In the data for DAVILA’s iCloud, investigators located a picture taken by DAVILA’s cellular phone on May 12, 2022, at 2:58 AM. This image depicts a Next Day Moulding truck, and an individual underneath the truck apparently cutting the catalytic converter. Investigators believe DAVILA took this photograph while committing the theft in Sharon, MA. This image follows:



**I. 5/17/22, Randolph, MA**

95. According to Randolph Police Reports 598204, 598161, and 598204 on or about May 17, 2022, Randolph Police received reports that twelve vehicles had their catalytic converters stolen. According to the report, Randolph Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at 12:45 AM to 1:30 AM on May 17, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Randolph Police noted that the driver exits and acts as a lookout while the passenger immediately goes below the vehicle and cuts the converters off. The lookout takes each converter and places it into the trunk, closing the trunk each time. A still image from the surveillance video recovered by Randolph Police follows:



96. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incident.

- a. TARGET PHONE 1 utilized a cell tower in Randolph, MA from 12:28 AM to 1:07 AM on May 17, 2022. This cell tower is approximately 1800 feet from the location of thefts in Randolph, MA.

97. Investigators reviewed a “Note” drafted by Rafael DAVILA on his cellular phone and observed a note that was last modified on February 2, 2023. This note appears to be a ledger of historical thefts. In the note, DAVILA wrote, “5-16-22 Randolph Braintree”. Investigators believe this is a note written by DAVILA memorializing the catalytic converters stolen by date and location. This note indicates the towns – Randolph and Braintree, and date of “5-16-22” where he targeted trucks. The date of May 16, 2022, is consistent with when DAVILA would have left his home in the Springfield area to commit the thefts into the morning of May 17, 2022.

**J. 5/19/22, Watertown, MA, Medford, MA, Malden, MA**

98. According to Watertown Police Report 22-9740-OF, on or about May 19, 2022, Watertown Police received a report of a catalytic converter theft from a green Toyota Prius. According to the report, Watertown Police was unable to obtain any surveillance footage of the suspect vehicle. A witness reported that at approximately 1:00 AM on May 19, 2022, he observed three male suspects attempting to lift the Prius and do work on the vehicle. According to the witness, one of the suspects saw the witness and left the area in a black Honda SUV. Investigators believe that this vehicle is in fact the MAROON ACURA MDX.

99. According to Medford Police Reports 22010138, 22010139, 22010140, 22010141, 22010142, 22010148, 22010149, and 22010400 on or about May 19, 2022, Medford Police received reports of catalytic converter thefts. Based upon review of the reports, a total of fourteen vehicles had their catalytic converters stolen. According to the reports, Medford Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts taking place at approximately 2:00 AM on May 19, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video recovered by Medford Police follows:



100. According to Malden Police Report 22002199 on or about May 19, 2022, Malden Police received a report of catalytic converter thefts from the Malden Department of Public Works. Based upon review of the reports, a total of six trucks had their catalytic converters stolen. The report did not list any surveillance video being recovered.

101. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incident.

- a. TARGET PHONE 1 utilized cell towers in Watertown, MA at 1:06 AM, 1:08 AM, 1:13 AM, 1:20 AM on May 19, 2022. The cell tower utilized by TARGET PHONE 1 at 1:06 AM is approximately 3000 feet from the location of the theft in Watertown, MA.
- b. TARGET PHONE 1 utilized cell towers in Medford, MA at 1:29 AM, 1:31 AM, 1:32 AM, 1:33 AM, 1:37 AM, 2:03 AM, 2:17 AM, 2:40 AM on May 19, 2022. The cell towers utilized by TARGET PHONE 1 are within 1.5 miles of the location of the thefts in Medford, MA.

- c. TARGET PHONE 1 utilized cell towers in Malden, MA at 2:55 AM, 3:10 AM, 3:19 AM, 3:24 AM, 3:25 AM on May 19, 2022. The cell towers utilized by TARGET PHONE 1 are within 1 mile of the location of the thefts in Malden, MA.

102. Investigators reviewed a “Note” drafted by Rafael DAVILA on his cellular phone and observed a note that appears to be a ledger of historical thefts. In the note, DAVILA wrote, “5-18-22 Waltham and one pri in Watertown and the Malden city trucks”. Investigators believe this is a note written by DAVILA memorializing catalytic converters stolen by date and location. This note indicates the towns – Waltham, Watertown and Malden, that he targeted, and date of “5-18-22.” The note also indicates he targeted one Toyota Prius (“one pri”), which is consistent with the Watertown report. The note also states “Malden city trucks”, which is consistent with the truck targeted at the Malden Department of Public Work. The date of May 18, 2022, is consistent with when DAVILA would have left his home in the Springfield area to commit the thefts into the morning of May 19, 2022.

**K. 5/20/22, Norwood, MA**

103. According to Norwood Police Report 22-586-OF, 22-587-OF, on or about May 20, 2022, Norwood Police received a report of a suspicious vehicle that had fled the area. Norwood Police returned to the area of the call and did not observe any damage to vehicles. According to the report, Norwood Police recovered surveillance images in the area of the call and were able to identify a vehicle at approximately 1:59 AM on May 20, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video recovered by Norwood Police follows:



104. Norwood Police also received a report from a Jaguar car dealership that there had been a break-in to their premises on May 20, 2022. Police learned that the toolboxes and cabinets had been rummaged through and a number of tools stolen. Additionally, a dealer license plate had been stolen, along with a key fob for a 2018 Chevrolet Tahoe. The Chevrolet Tahoe was also stolen from the premises. A few days later, the stolen Chevrolet Tahoe was located at 245 Porter Lake Drive, Springfield, MA. The report notes that the stolen Tahoe had damage to its taillights, headlights, grills, and the driver's side door had been removed. The location where the stolen Tahoe was recovered is less than a mile from the residence of Rafael DAVILA and Nicolas DAVILA's parents.

105. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incident.

- a. TARGET PHONE 1 utilized cell towers in Norwood, MA on May 20, 2022, at 12:02 AM, 12:03 AM, 12:06 AM, 12:11 AM, 12:18 AM, 12:46 AM, 12:52 AM, 1:03 AM, 1:18 AM, 1:33 AM, 1:48 AM, and 2:03 AM. The location of the cell towers used by TARGET PHONE 1 is less than a mile from the location of the Jaguar dealership.
- b. TARGET PHONE 1 utilized a cell tower in Springfield, MA on May 20, 2022, at 8:35 AM. The location of the cell tower used by TARGET PHONE 1 is less than a mile from the location of where the stolen Tahoe was recovered.

**L. 7/21/22, Wilmington, MA and Lynn, MA**

106. According to Wilmington Police Reports 22-925-OF, 22-926-OF, 22-929, and 22-930-OF,

on or about July 21, 2022, Wilmington Police received reports of several catalytic converter thefts. Based upon review of the reports, a total of eight vehicles had their catalytic converters stolen. One of the victims was a business known as “1-800 Got Junk”. According to the reports, Wilmington Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from the surveillance video recovered by Wilmington Police follows:



107. According to Lynn Police Report 22049203 and 22049182, on or about July 21, 2022, Lynn Police received reports of catalytic convert thefts. Based on review of the reports, three vehicles were targeted and had their catalytic converters stolen. According to the reports, Lynn Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 3:15 AM on July 21, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video recovered by Lynn Police follows:



108. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incident.

- a. TARGET PHONE 1 utilized cell towers in Wilmington, MA at 11:49 PM, 11:51 PM, 11:53 PM on July 20, 2022, and at 12:20 AM, 12:38 AM, 12:41 AM, 12:44 AM, 12:53 AM, 1:08 AM, and 1:15 AM, on July 21, 2022. The cell towers were within 1.5 miles from the locations of the thefts in Wilmington, MA.
- b. TARGET PHONE 1 utilized cell towers in Lynn, MA at 2:49 AM through 3:59 AM on July 21, 2022. At 3:11 AM, TARGET PHONE 1 utilized a cell tower that was within 2500 feet of the locations of the thefts in Lynn, MA.

109. Investigators reviewed a “Note” drafted by Rafael DAVILA that appears to be a ledger of historical thefts. In the note, DAVILA wrote, “7-20-22 lynn shitty ghetto” and “7-20-22 1800 junk Woburn gotta go back”. Investigators believe this note memorializes the catalytic converters stolen by date and location. This note indicates the towns – Lynn, and Woburn that he targeted, and date of “7-20-22.” The date of July 20, 2022, is consistent with when DAVILA would have left his home in the Springfield area to commit the thefts into the morning of July 21, 2022. Of note, the location of 1-800-Got Junk targeted in Wilmington, MA, is close to the Woburn, MA line.

**M. 7/26/22, Easton, MA**

110. According to Easton Police Reports 22EAO-636-OF, on or about July 26, 2022, Easton Police received a report of catalytic converter thefts. Based upon review of the report, six vehicles were targeted and had their catalytic converters stolen. According to the report, Easton Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at

approximately 1:56 AM on July 26, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video footage recovered by Easton Police follows:



111. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incident.

- a. TARGET PHONE 1 utilized cell towers in Mansfield, MA at 11:48 PM on July 25, 2022, and 3:53 AM on July 26, 2022. The cell towers utilized by TARGET PHONE 1 are less than three miles from the location of the thefts in Easton, MA.

112. Investigators reviewed a “Note” drafted by Rafael DAVILA that appears to be a ledger of historical thefts. In the note, DAVILA wrote, “7-25-22 Mansfield is burnt, some foxborough, Easton done, Norton done, Taunton mostly done and hot”. Investigators believe this is a note written by DAVILA memorializing the catalytic converters stolen by date and location. This note indicates the towns – including, Easton -- that he targeted, and date of “7-25-22.” The date of July 25, 2022, is consistent with when DAVILA would have left his home in the Springfield area to commit the thefts into the morning of

July 26, 2022.

**N. 7/28/22, Norwood, MA and Woburn, MA**

113. According to Norwood Police Report 22-859-OF, on or about July 28, 2022, Norwood Police caught sight of a vehicle believed to be involved in recent catalytic converter thefts. According to the report, Norwood Police followed the vehicle and attempted to pull it over. Upon Norwood Police activating their lights and sirens, the vehicle fled and reached speeds over 100 MPH as it made its escape.

114. According to Norwood Police report 22-861-OF, on July 28, 2022, Norwood Police received reports of two vehicles that had their catalytic converters stolen. Norwood Police recovered surveillance video from the area that depicted the vehicle involved in the theft at approximately 12:56 AM on July 28, 2022. The vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video footage recovered by Norwood Police follows:



115. According to Woburn Police Reports 22-196-OF, and 22-1297-OF, on or about July 28, 2022, Woburn Police received reports of catalytic convert thefts. Based on review of the reports, three vehicles were targeted and had their catalytic converters stolen. According to the reports, Woburn Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 3:20 AM on July 28, 2022. The suspect vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video footage recovered by Woburn Police follows



116. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Norwood, MA at 9:13 PM and 11:40 PM on July 27, 2022. The cell tower is less than one mile from the location of the thefts in Norwood, MA.
- b. TARGET PHONE 1 utilized cell towers in Woburn, MA at 1:30 and 3:40 AM on July 28, 2022. One of the cell towers utilized by TARGET PHONE 1 during this period is approximately 500 feet from the location of the thefts in Woburn.

**O. 8/4/22, Beverly, MA**

117. According to Beverly Police Reports 469109, and 469115, on or about August 4, 2022, Beverly Police received reports of two vehicles that had their catalytic converters stolen. According to the report, Beverly Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 4:28 AM on August 4, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video footage recovered by Beverly Police follows:



118. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized cell towers in Beverly, MA at 3:39 AM, 3:42 AM, 3:45 AM, 3:56 AM, 3:59 AM on August 4, 2022. The cell towers are less than two miles from the location of the thefts in Beverly, MA.

**P. 8/16/22, Woburn, MA**

119. According to Woburn Police Reports 22-1438-OF, 22-1439-OF, 22-1441-OF, 22-1442-OF, 22-1443-OF, 22-1444-OF, 22-1445-OF, 22-1447-OF, 22-1449-OF, 22-1451-OF, 22-1453-OF, and 22-1455-OF, on or about August 16, 2022, Woburn Police received reports of several catalytic converter thefts. Based upon review of the reports, twenty-six (26) vehicles were targeted and had their catalytic converters stolen. According to the report, Woburn Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts that, according to the reports, appears to match the description of the MAROON ACURA MDX.

120. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized cell towers in Woburn, MA at 8:57 PM, 9:14 PM, and 11:24 PM on August 15, 2022, and 12:13 AM and 1:24 AM on August 16, 2022. The cell towers utilized by TARGET PHONE 1 are less than two miles from the location of the thefts in Woburn, MA.

121. Investigators reviewed a “Note” drafted by Rafael DAVILA that appears to be a ledger of historical thefts. In the note, DAVILA wrote, “8-15-22 Woburn still some left”. Investigators believe this is a note memorializing the catalytic converters stolen from Woburn and that some converters still remained to be targeted.

**Q. 8/18/22, Carver, MA & Plymouth MA**

122. According to Carver Police Report 22-9681-OF, on or about August 18, 2022, Carver Police received reports of several catalytic converter thefts. Based upon review of the reports, two vehicles were targeted and had their catalytic converters stolen. According to the report, Carver Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 1:15 AM on August 18, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video footage observed by Carver Police follows:



123. According to Plymouth Police Reports 22PLY-25761-OF, 22PLY-5779-OF, 22-5792-OF, and 22-52826-OF, on or about August 18, 2022, Plymouth Police received reports of several catalytic converter thefts. Based upon review of the reports, six vehicles were targeted and had their catalytic converters stolen. That night a Plymouth Officer observed a vehicle consistent with the MAROON ACURA MDX in the parking lot of business, and it then fled the scene. According to the report, Plymouth Police

recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 12:30 AM on August 18, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video footage follows:



124. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Carver, MA at 9:48 PM, 10:55 PM and 11:54 PM on August 17, 2022. The cell tower utilized by TARGET PHONE 1 is less than three miles from the location of the thefts in Carver, MA.
- b. TARGET PHONE 1 utilized a cell tower in Plymouth, MA at 8:45 PM and 11:54 PM on August 17, 2022. The cell tower utilized by TARGET PHONE 1 is less than one mile from the locations of the thefts in Plymouth, MA.

125. Investigators reviewed a “Note” drafted by Rafael DAVILA that appears to be a ledger of historical thefts. In the note, DAVILA wrote, “8-17-22 Plymouth.... Maybe stay away”. Investigators believe this is a note memorializing the catalytic converters theft activity in Plymouth, on August 18, 2022, and the police activity in that town.

**R. 8/23/22, Canton, MA**

126. According to Canton Police Reports 22-717-OF, 22-718-OF, on or about August 23, 2022, Canton Police received reports of several catalytic converter thefts. Based upon review of the reports, three vehicles were targeted and had their catalytic converters stolen. According to the report, Canton Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at 3:30 AM on August 23, 2022. This vehicle appears to match the description of the MAROON

ACURA MDX. A still image from surveillance video footage follows:



127. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Westwood, MA at 1:48 AM, 2:19 AM, 2:22 AM and 2:25 AM on August 23, 2022. The cell tower utilized by TARGET PHONE 1 is 3.1 miles and 4.5 miles from the locations of the thefts in Canton, MA.

128. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 8 utilized by Carlos FONSECA relative to the incidents.

- a. TARGET PHONE 8 utilized a cell tower in Sharon, MA at 2:29 AM on August 23, 2022. The cell tower utilized by TARGET PHONE 8 is within 3 miles of the locations of the thefts in Canton, MA.

129. Investigators reviewed a “Note” drafted by Rafael DAVILA that appears to be a ledger of historical thefts. In the note, DAVILA wrote, “8-22-22 Westwood Dedham Roxbury canton all done”. Investigators believe this is a note memorializing the catalytic converters stolen by date and location; specifically, thefts in Canton, Westwood, Dedham and Roxbury that would have taken place on August 23, 2022.

130. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FONSECA (utilizing TARGET PHONE 8) on August 22, 2022. Those text messages capture DAVILA and FONSECA meeting up at 11:38 PM prior to travelling to Canton, MA to commit the thefts.

Date / Time	Author	Content
8/22/2022 2:30:29 PM	FONSECA	Yoooo

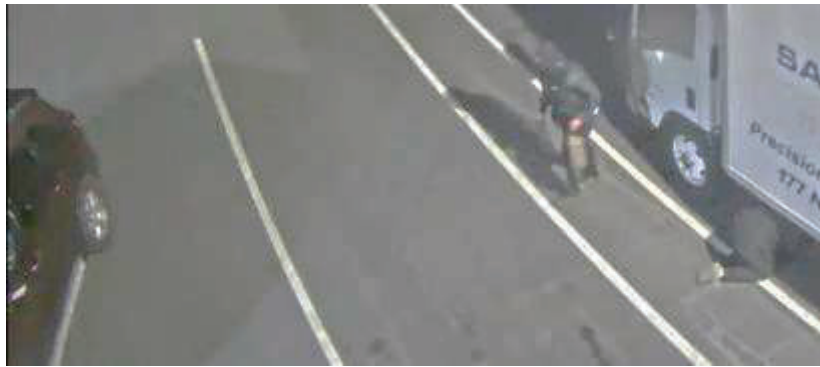
8/22/2022 2:34:57 PM	DAVILA	Hey bro!
8/22/2022 11:38:32 PM	FONSECA	Yo Im outside

**S. 8/25/22, Middleton, MA**

131. According to Middleton Police Report 22MID-575-OF, on or about August 26, 2022, Middleton Police received a reports of a catalytic converter theft. Based upon review of the report, one vehicle was targeted and had its catalytic converters stolen. According to the report, Middleton Police recovered surveillance video in the area of the theft and were able to identify a vehicle involved in the thefts at approximately 3:50 AM on August 25, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video footage follows:



*Maroon Acura MDX*



*Suspect Carrying Converter, 2<sup>nd</sup> Suspect Cutting Underneath Truck*

132. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Wilmington, MA at 2:24 AM on August 25, 2022. The cell tower utilized by TARGET PHONE 1 is 6 miles from the location of the theft in Middleton, MA.

133. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 8 utilized by Carlos FONSECA relative to the incidents.

- a. TARGET PHONE 8 utilized a cell tower in Middleton, MA at 4:00 AM on August 25, 2022. The cell tower utilized by TARGET PHONE 8 is 500 feet from the location of the theft in Middleton, MA.

134. Investigators reviewed a “Note” drafted by Rafael DAVILA that appears to be a ledger of historical thefts. In the note, DAVILA wrote, “8-24-22 Chelmsford,north

Billerica, Billerica, Bedford, Burlington, north reading, Wilmington, Middleton All done”. Investigators believe this is note memorializing catalytic converters thefts in various communities, including Middleton on August 25, 2022.

135. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FONSECA (utilizing TARGET PHONE 8) on August 23, 2023. Those text messages capture DAVILA and FONSECA discussing how DAVILA has not yet identified any locations to target for theft. DAVILA describes needing to do additional “homework” but that “[e]verything else [is] ready” for them to commit more thefts. FONSECA agrees and indicates that he would be ready, but is alright with going out the following day as well.

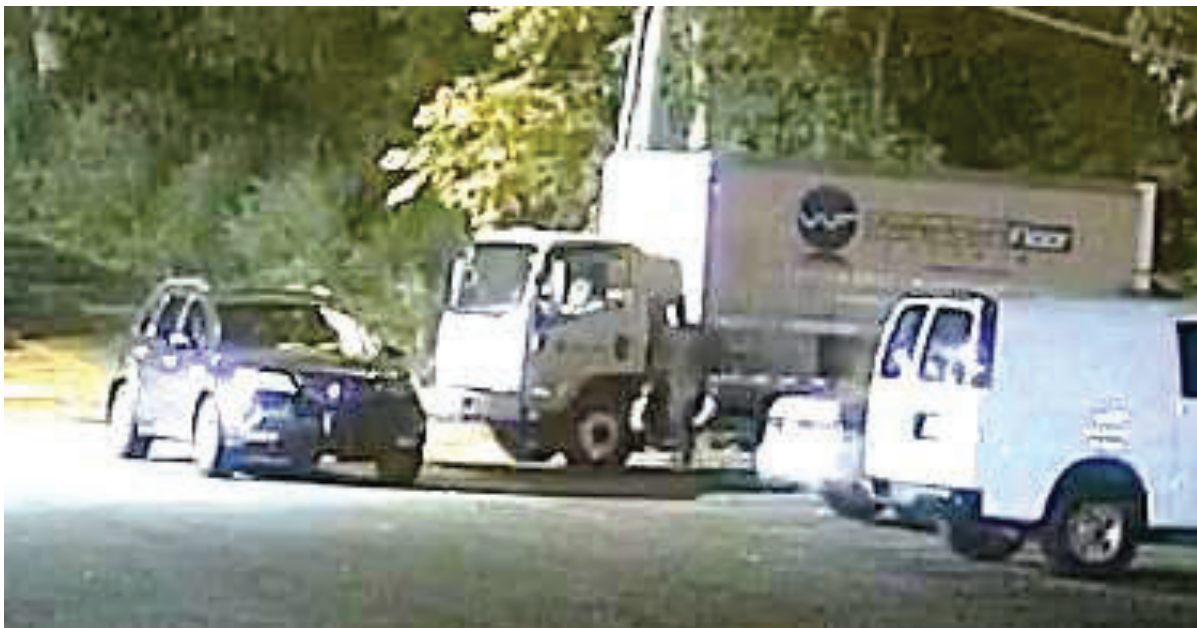
Date / Time	Author	Content
8/23/2022 10:23:20 PM	FONSECA	Yo
8/23/2022 10:31:01 PM	DAVILA	Cabron
8/23/2022 10:31:27 PM	DAVILA	I haven't found shit still doing homework. Everything else ready tho so I'll let you know soon
8/23/2022 10:31:58 PM	FONSECA	I just got up I'ma shower now if u don't find much we leave it for tomorrow so we not rushing it
8/23/2022 10:32:17 PM	FONSECA	I'ma shower get dressed in case though
8/23/2022 10:32:31 PM	DAVILA	Ok I'm on it tho

136. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FONSECA (utilizing TARGET PHONE 8) on August 24, 2022. DAVILA informs FONSECA that he has completed his “homework” at 1:15 AM on August 24, 2022, and that they will be “good” to commit thefts the following day. The text messages then capture DAVILA and FONSECA meeting up around 10:40 PM prior to travelling to Middleton, MA to commit the theft.

Date / Time	Author	Content
8/24/2022 1:15:11 AM	DAVILA	I literally just finished doing homework rn
8/24/2022 1:15:31 AM	FONSECA	Dale so we should be good for Tom
8/24/2022 1:15:32 AM	DAVILA	We good for tomorrow
8/24/2022 9:09:29 PM	DAVILA	Yooo
8/24/2022 9:10:34 PM	FONSECA	Yoooo call you soon puti with my daughter feeding her
8/24/2022 9:10:49 PM	DAVILA	We out at 9:30?
8/24/2022 9:11:58 PM	FONSECA	Im aiming for that just waiting for my daughters grandma to get home so I can drop off the baby my bms at work
8/24/2022 9:14:09 PM	DAVILA	Ok just shoot me a text or call me when your ready to go
8/24/2022 10:38:14 PM	FONSECA	I'll be done In 5
8/24/2022 10:38:34 PM	DAVILA	Ok I'm on the way

#### **T. 8/30/22, Waltham, MA, and Peabody, MA**

137. According to Waltham Police Reports 22024927, 22024928, 22024929, 22024930, and 22024989, on or about August 30, 2022, Waltham Police received reports of several catalytic converter thefts. Based upon review of the reports, ten vehicles were targeted and had their catalytic converters stolen. According to the report, Waltham Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts around 2:08 AM on August 30, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video footage recovered by Waltham Police follows:



*Suspect Holding Two Catalytic Converters. Acura MDX parked to left.*

138. According to Peabody Police Reports 22-2798-OF, on or about August 30, 2022, Peabody Police received a report of catalytic converter thefts. Based upon review of the report, three vehicles were targeted and had their catalytic converters stolen. According to the report, Peabody Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts between 4:30 AM and 5:00 AM on August 30, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video footage observed by Peabody Police follows:



139. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized numerous cell towers in Waltham, MA from 12:18 AM to 2:20 AM on August 30, 2022. TARGET PHONE 1 utilized cell towers that were within 1 mile from the locations of the thefts in Waltham, MA.
- b. TARGET PHONE 1 utilized a cell tower in Woburn, MA at 2:24 AM on August 30, 2022, in the area of the I-95 / I-93 crossover. TARGET PHONE 1 then registers no network activity until 4:58 AM on August 30, 2022, when it utilizes a cell tower in Woburn, MA, in the area of the I-95 / I-93 crossover.

140. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 8 utilized by Carlos FONSECA relative to the incidents.

- a. TARGET PHONE 8 utilized a cell tower in Peabody, MA at 4:45 AM on August 30, 2022. The cell tower utilized by TARGET PHONE 8 is approximately 1 mile from the location of the thefts in Peabody, MA.

141. Investigators reviewed a “Note” drafted by Rafael DAVILA that appears to be a ledger of historical thefts. In the note, DAVILA wrote, “8-29-22 Waltham, Watertown, south Peabody, Peabody All done”. Investigators believe this is a note memorializing the catalytic converter thefts in various communities, including Waltham and Peabody taking place on August 30, 2022.

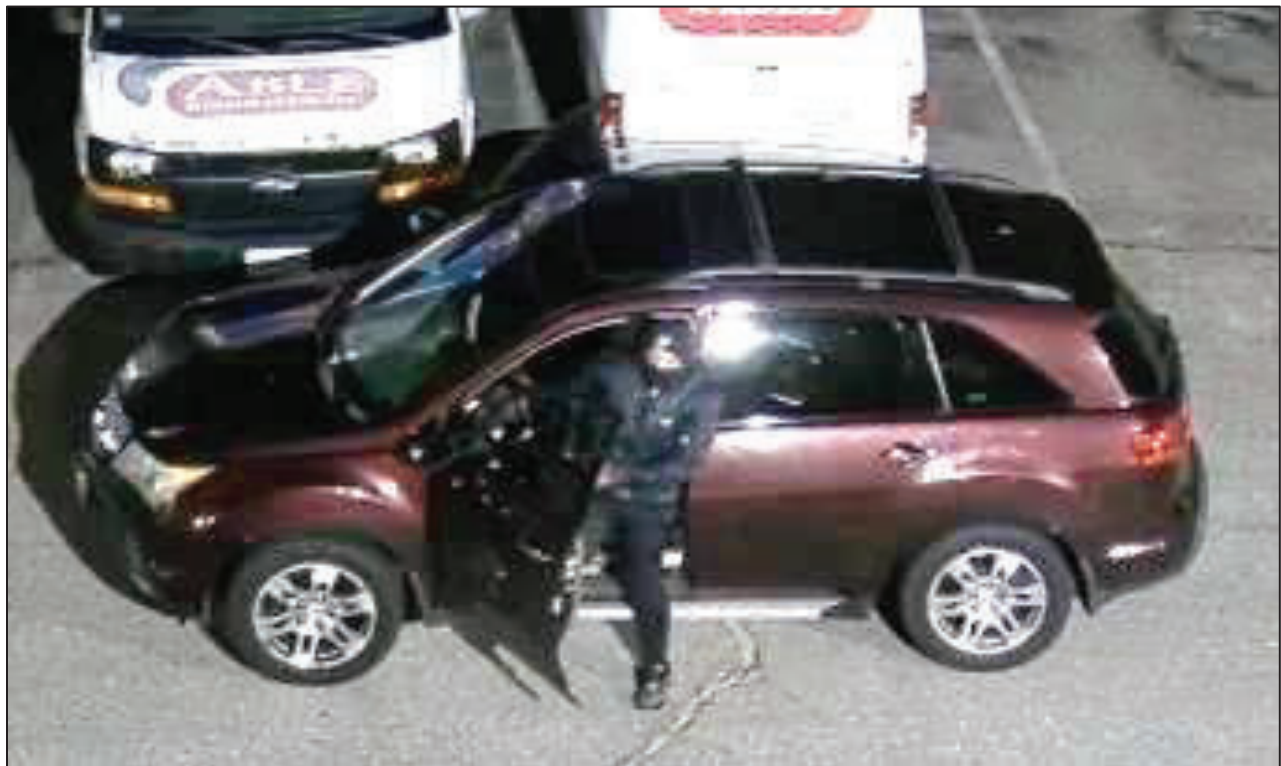
142. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FONSECA (utilizing TARGET PHONE 8) on August 29, 2022. Those text messages capture DAVILA and FONSECA meeting up around 11:50 PM prior to travelling to Peabody, MA and Waltham, MA to

commit the thefts.

Date / Time	Author	Content
8/29/2022 10:21:31 PM	DAVILA	Hey I should be getting you at about 10:30
8/29/2022 10:21:38 PM	FONSECA	K
8/29/2022 11:44:02 PM	DAVILA	Like 4 min away
8/29/2022 11:44:08 PM	FONSECA	K

**U. 9/1/22, Hingham, MA, Norwell, MA, Rockland, MA**

143. According to Hingham Police Reports 22HIN-1014-OF, 22HIN-1015-OF, and 22HIN-1016-OF, on or about September 1, 2022, Hingham Police received reports of several catalytic converter thefts. Based upon review of the reports, three vehicles were targeted and had their catalytic converter stolen. According to the reports, Hingham Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 1:37 AM, and 2:18 AM on September 1, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from the surveillance video footage recovered by Hingham Police follows:





*Suspect Loading Catalytic Converter into Maroon Acura MDX, Targeted Vehicle Jacked Up to Facilitate Cutting*

144. According to Norwell Police Report 22NOW-396-OF, on or about September 1, 2022, Norwell Police received a report of a catalytic converter theft. Based upon review of the report, one vehicle was targeted and had its catalytic converter stolen. According to the report, Norwell Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the theft at approximately 1:30 AM on September 1, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video recovered by Norwood Police follow:



*Maroon Acura MDX to left, Suspect Cutting Catalytic Converter from Targeted Vehicle that is Jacked Up to Facilitate Cutting*

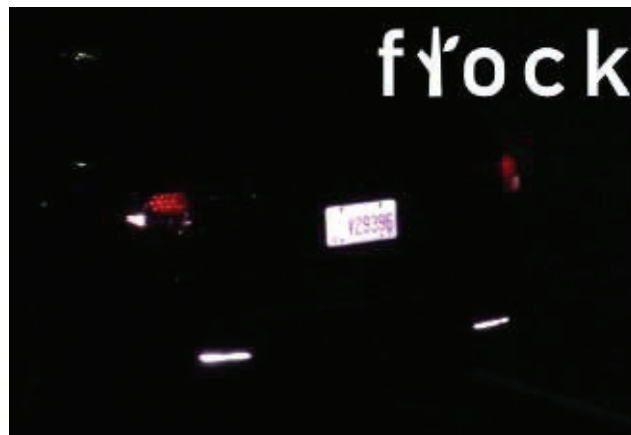
145. According to Rockland Police Reports 22ROC-42139-OF, 22ROC-42174-OF, 22ROC-42180-OF, 22ROC-42186, and 22ROC-42315-OF, on or about September 1, 2022, Rockland Police received reports of catalytic converter thefts. Based upon review of the reports, seven vehicles were targeted and had their catalytic converters stolen. One of the vehicles targeted was owned by the Weymouth Food Pantry. According to the reports, Rockland Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 1:42 AM and 2:54 AM on September 1, 2022. According to the reports, the vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video recovered by Rockland Police follow:



146. Surveillance images show the MAROON ACURA MDX with New Hampshire registration V29396 attached traveling on Route 106 in West Bridgewater, Massachusetts, on the same night of the Hingham, Norwell, and Rockland thefts described above. A still image from this surveillance follows.



147. An Acura MDX was captured by a license plate reader in Randolph, MA on September 1, 2022, at 12:11 AM. A still image provided showing the vehicle with New Hampshire V29396 is attached below.



148. According to eBay records, a New Hampshire Veteran's Plate V29396 was sold on August 8, 2022 to DAVILA (using his eBay account named "partcloud"). DAVILA is listed as the user of the "partcloud" eBay account and the account is associated with a phone number ending in 6609 (TARGET PHONE 1). DAVILA also listed his address in Feeding Hills, Massachusetts as the shipping address for this purchase.

149. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Hingham, MA at 1:27 AM on September 1, 2022. This cell tower is approximately 300 feet from the location of the theft in Hingham,

MA. This cell tower is also approximately 1 mile from the locations of the thefts in Rockland, MA.

- b. TARGET PHONE 1 utilized a cell tower in Hanover, MA at 11:43 PM on August 31, 2022, and at 2:22 AM on September 1, 2022. This cell tower is 1.5 miles from the location of the thefts in Rockland, MA. The cell tower is approximately 1300 feet from the location of the theft in Norwell, MA.

150. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 8 utilized by Carlos FONSECA relative to the incidents.

- a. TARGET PHONE 8 utilized a cell tower in Hingham, MA at 2:10 AM and 2:25 AM on September 1, 2022. This cell tower is approximately 300 feet from the location of the theft in Hingham, MA. This cell tower is also approximately 1 miles from the locations of the thefts in Rockland, MA.
- b. TARGET PHONE 8 utilized a cell tower in Rockland, MA at 1:40 AM on September 1, 2022. This cell tower is within 2 miles of the locations of the thefts in Rockland, MA. This cell tower is approximately 3000 feet from the location of the theft in Norwell, MA.

151. Investigators reviewed a “Note” drafted by Rafael DAVILA that appears to be a ledger of historical thefts. In the note, DAVILA wrote, “8-31-22 Norfolk, Braintree, Hanover, Holbrook, Norwell, rockland, Whitman”. Investigators believe this is a note memorializing catalytic converter thefts in various communities, including Norwell, and Rockland taking place on September 1, 2022.

152. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FONSECA (utilizing TARGET PHONE 8) on August 31, 2022. Those text messages capture DAVILA and FONSECA meeting up around 10:55 PM prior to travelling to Hingham, MA, Norwell, MA and Rockland, MA to commit the thefts.

Date / Time	Author	Content
8/31/2022 4:17:20 PM	FONSECA	Yoo
8/31/2022 10:50:48 PM	DAVILA	5 min away
8/31/2022 10:51:32 PM	FONSECA	K

## **V. 9/5/22, Westfield Home Depot Purchase**

153. Investigators obtained records and video footage from Home Depot. Review of those records revealed that on September 5, 2022, at 9:31 PM, DAVILA purchased thirty (30) 9-inch Diablo Sawzall blades (“Diablo 9” 8/10 TPI BI-M THK MTL 15PK”), for a total of \$95.94 at a Home Depot

located in Westfield, Massachusetts. DAVILA utilized self-checkout and paid \$100 in cash. After the purchase, surveillance video showed that DAVILA exited the store and entered the MAROON ACURA MDX and departed. Of note, DAVILA can be observed wearing black sneakers with a reflective piping. Still images showing DAVILA exiting the Home Depot and the MAROON ACURA MDX follows:



**W. 9/6/22, West Bridgewater, MA, and Easton, MA**

154. According to West Bridgewater Police Reports 22-260-OF, and 22-262-OF on or about September 6, 2022, West Bridgewater Police received reports of catalytic converter thefts. Based upon review of the reports, two vehicles were targeted and had catalytic converters stolen. According to the report, West Bridgewater Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 2:40 AM and 3:40 AM on September 6, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video footage recovered by West Bridgewater Police follows:



155. According to Easton Police Report 22EAO-768-OF, on or about September 6, 2022, Easton Police received a report of a catalytic converter theft. Based upon review of the report, one vehicle was targeted and had its catalytic converters stolen. According to the report, Easton Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the theft at approximately 4:50 AM on September 6, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video footage recovered by Easton Police follows:



156. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized cell tower in Brockton, MA at 3:19 AM, and 3:42 AM on September 6, 2022. This cell tower is approximately 5000 feet and 1.5 miles from the locations of the thefts in West Bridgewater, MA.
- b. TARGET PHONE 1 utilized a cell tower in Easton, MA at 4:32 AM on September 6, 2022. This cell tower is approximately 2.5 miles from the location of the theft in Easton, MA.

157. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 8 utilized by Carlos FONSECA relative to the incidents.

- a. TARGET PHONE 8 utilized a cell tower in West Bridgewater, MA at 3:46 AM on September 6, 2022. This cell tower is less than 1.25 miles from the locations of the theft in West Bridgewater, MA.
- b. TARGET PHONE 8 utilized a cell tower in Easton, MA at 4:31 AM, 4:46 AM and 5:01 AM on September 6, 2022. This cell tower is approximately 3000 feet from the location of the theft in Easton, MA.

158. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FONSECA (utilizing TARGET PHONE 8) on September 5, 2022. Those text messages capture DAVILA and FONSECA meeting up around 10:45 PM prior to travelling to Easton, MA, and West Bridgewater, MA to commit the thefts.

Date / Time	Author	Content
9/5/2022 9:42:58 PM	FONSECA	Dont forget the sticker lol
9/5/2022 9:43:22 PM	DAVILA	Ok
9/5/2022 10:27:06 PM	FONSECA	Getting out shower now
9/5/2022 10:27:58 PM	DAVILA	Ok I'll be Heading over in 10-15 min
9/5/2022 10:28:07 PM	FONSECA	Perfect
9/5/2022 11:11:14 PM	DAVILA	5 min away
9/5/2022 11:11:21 PM	FONSECA	K

#### **X. 9/8/22, Lawrence, MA, Haverhill, MA, Chelmsford, MA**

159. According to Lawrence Police Report 220679 on or about September 8, 2022, Lawrence Police received a report of catalytic converter theft. Based upon review of the reports, one vehicle was targeted and had two of its catalytic converters stolen. According to the report, Lawrence Police recovered surveillance video in the area of the theft and were able to identify a vehicle involved in the theft at approximately 2:02 AM on September 8, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video recovered by Lawrence Police follows:



160. According to Haverhill Police Report 22043034 on or about September 8, 2022, Haverhill Police received a reports of a catalytic converter theft. Based upon review of the report, one vehicle was targeted and had it catalytic converter stolen. According to the report, Haverhill Police recovered surveillance video in the area of the theft and were able to identify a vehicle involved in the thefts at approximately 2:43 AM on September 8, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video footage recovered by Haverhill Police follows:



161. According to Chelmsford Police Report 841126, on or about September 8, 2022, Chelmsford Police received a report of a catalytic converter theft. Based upon review of the report, one vehicle was targeted and had its catalytic converter stolen. According to the report, Chelmsford Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 4:34 AM on September 8, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video footage recovered by Chelmsford Police follows:



162. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized cell towers in Methuen, MA at 12:43 AM and 12:50 AM on September 8, 2022. The cell towers utilized by TARGET PHONE 1 are less than 3 miles from the location of the theft in Lawrence, MA.
- b. TARGET PHONE 1 utilized a cell tower in Haverhill, MA at 1:27 AM on September 8, 2022. This cell tower utilized by TARGET PHONE 1 is approximately 1800 feet from the location of the theft in Haverhill, MA.

163. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 8 utilized by Carlos FONSECA relative to the incidents.

- a. TARGET PHONE 8 utilized a cell tower in Methuen, MA at 12:43 AM on September 8, 2022. The cell tower utilized by TARGET PHONE 8 is less than 3 miles from the location of the theft in Lawrence, MA.

164. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FONSECA (utilizing TARGET PHONE 8) on September 7, 2022. Those text messages capture DAVILA and FONSECA meeting up at 11:35 PM before heading out to Chelmsford, MA, Lawrence, MA, and Haverhill, MA to commit the thefts.

Date / Time	Author	Content
9/7/2022 10:39:04 PM	FONSECA	I'll be ready in 15
9/7/2022 10:39:44 PM	DAVILA	Ok
9/7/2022 11:29:47 PM	DAVILA	5 min away
9/7/2022 11:29:54 PM	FONSECA	Dale Im outside
9/7/2022 11:30:47 PM	DAVILA	Ok coo

#### **Y. 9/13/22, Hingham, MA, Pembroke, MA, Hanover, MA**

165. According to Hingham Police Report 22HIN-1071-OF, on or about September 13, 2022, Hingham Police received reports of catalytic converter thefts. Based upon review of the reports, two vehicles were targeted and had catalytic converters stolen. According to the report, Hanover Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 1:30 AM on September 13, 2022. This vehicle appears to match the description of the MAROON ACURA MDX.

166. According to Pembroke Police Report 22-10399-OF, on or about September 13, 2022, Pembroke Police received a report of a catalytic converter thefts. Based upon review of the report, twelve vehicles were targeted and had their catalytic converters stolen. According to the report, Pembroke Police

recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts taking place at approximately 2:00 AM on September 13, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. The still image from surveillance video footage provided by Pembroke Police follows:



167. According to Hanover Police Report 22HAN-672-OF, on or about September 13, 2022, Hanover Police received a report of a catalytic converter theft. Based upon review of the report, one vehicle was targeted and had two of its catalytic converters stolen. According to the report, Hanover Police recovered surveillance video in the area of the theft and were able to identify a vehicle involved in the theft at approximately 4:20 AM on September 13, 2022. This vehicle appears to match the description of the MAROON ACURA MDX.

168. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Hingham, MA at 12:17 AM on September 13, 2022. The cell tower was 2400 feet from the location of the theft in Hingham, MA.
- b. TARGET PHONE 1 utilized a cell tower in Hanover, MA at 4:13 AM on September 13, 2022. The cell tower was 2500 feet from the location of the theft in Hanover, MA.

169. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 8 utilized by Carlos FONSECA relative to the incidents.

- a. TARGET PHONE 8 utilized a cell tower in East Weymouth, MA at 12:53 AM on September 13, 2022. The cell tower was 1 mile from the location of the theft in Hingham, MA.
- b. TARGET PHONE 8 utilized a cell tower in Marshfield, MA at 1:46 AM and 2:53 AM on September 13, 2022. The cell tower was 4000 feet from the location of the thefts in Pembroke, MA.
- c. TARGET PHONE 8 utilized a cell tower in Hanover, MA at 4:13 AM on September 13, 2022. The cell tower was 2500 feet from the location of the theft in Hanover, MA.

170. Investigators reviewed a “Note” drafted by Rafael DAVILA that appears to be a ledger of historical thefts. In the note, DAVILA wrote, “9-12-22 Allston/Boston, Roxbury, Weymouth, hingham, Hanover, north pembroke, pembroke, hanson”. Investigators believe this is note memorializes the catalytic converter thefts in various communities, including Hingham, Hanover, and Pembroke that committed on September 13, 2022.

171. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FONSECA (utilizing TARGET PHONE 8) on September 12, 2022. Those text messages capture DAVILA and FONSECA meeting up at 11:20 PM before heading out to Hanover, MA, Hingham, MA, and Pembroke, MA to commit the thefts.

Date / Time	Author	Content
9/12/2022 9:56:55 PM	FONSECA	How we looking for time
9/12/2022 9:57:21 PM	DAVILA	I should be there about 10:30.
9/12/2022 11:15:35 PM	FONSECA	Ready
9/12/2022 11:15:37 PM	FONSECA	Outside
9/12/2022 11:18:23 PM	DAVILA	Like 4 min away

## **Z. 9/14/22, Home Depot Purchase**

172. Investigators obtained records and video footage from Home Depot. Review of those records revealed that on September 14, 2022, at 5:58 PM, DAVILA purchased thirty (30) 9-inch Diablo Sawzall blades (“Diablo 9” 8/10 TPI BI-M THK MTL 15PK”), and “Large red nitrile level 3 cut resistant” gloves for a total of \$117.84 at a Home Depot located in Westfield, Massachusetts. DAVILA utilized self-checkout and paid \$120 in cash. After the purchase, surveillance video showed that DAVILA exited the store and entered the MAROON ACURA MDX and departed. Of note, DAVILA can be observed wearing

a black Adidas hat. A still image showing DAVILA exiting Home Depot and the MAROON ACURA MDX follows:



173. During this transaction DAVILA wore a black Adidas hat. Additionally, the large red nitrile level 3 cut resistant gloves appear identical to the red gloves worn by one of the suspects in the surveillance video from the Hudson theft taking place about 12 hours later, described below. An image of the gloves purchased by DAVILA during the September 14, 2022, transaction follows:



**AA. 9/15/22, Bellingham, MA, Franklin, MA, Hudson, MA**

174. According to Bellingham Police Report 22-1301-OF, on or about September 15, 2022, Bellingham Police received a reports of catalytic converter thefts. Based upon review of the reports, two vehicles were targeted and had catalytic converters stolen. According to the report, Bellingham Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 12:41 AM on September 15, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video recovered by Bellingham Police follows:



175. According to Franklin Police Reports 2022-I-01377, 2022-I-01378, 2022-I-01379, and 2022-I-01389, on or about September 15, 2022, Franklin Police received reports of several catalytic converter thefts. Based upon review of the reports, fives vehicles were targeted and had their catalytic converters stolen. According to the reports, Franklin Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 1:19 AM and 1:40 AM on September 15, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video footage recovered by Franklin Police follows:



176. According to Hudson Police Reports 22HUD-1320-OF, 22HUD-1322-OF, 22HUD-1323-OF, and 22HUD-1326-OF, on or about September 15, 2022, Hudson Police received reports of several catalytic converter thefts. Based upon review of the reports, six vehicles were targeted and had their catalytic converters stolen. According to the report, Hudson Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 3:57 AM and 5:57 AM on Hudson, MA. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video recovered by Hudson Police follows:



177. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Bellingham, MA at 10:27 AM on September 14, 2022. This cell tower was 2 miles from the location of the thefts in Bellingham, MA.
- b. TARGET PHONE 1 utilized a cell tower in Franklin, MA at 12:12 AM on September 15, 2022. This cell tower was 3100 feet from the location of the theft in Bellingham, MA. This cell tower was less than 4500 feet from the locations of thefts in Franklin, MA
- c. TARGET PHONE 1 utilized a cell tower in Franklin, MA at 8:52 PM on September 14, 2022. This cell tower utilized by TARGET PHONE 1 was 2000 feet from a location of a theft in Franklin, MA.
- d. TARGET PHONE 1 utilized a cell tower in Marlborough, MA at 4:40 AM on September 15, 2022. This cell tower was 2.5 miles from the locations of thefts in Hudson, MA.

178. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 8 utilized by Carlos FONSECA relative to the incidents.

- a. TARGET PHONE 8 utilized a cell tower in Bellingham, MA at 12:45 AM and 1:00 AM on September 15, 2022. The cell tower was 2800 feet from the location of the thefts in Bellingham, MA.
- b. TARGET PHONE 8 utilized cell towers in Franklin, MA at 1:23 AM, 1:38 AM, 1:53 AM, 1:58 AM, 2:38 AM, and 2:53 AM on September 15, 2022. The cell towers were less than one miles from the locations of the thefts in Franklin, MA.
- c. TARGET PHONE 8 utilized cell towers in Hudson, MA at 4:08 AM, 4:38 AM, 4:51 AM, 4:53 AM, and 5:28 AM, on September 15, 2022. The cell towers were less than one mile from the locations of the thefts in Hudson, MA.

179. Investigators reviewed a “Note” drafted by Rafael DAVILA that appears to be a ledger of historical thefts. In the note, DAVILA wrote, “9-14-22 Hudson, northborough, Marlborough,Norfolk, Franklin, bellingham, hopedale, Milford ”. Investigators believe this is a note memorializing the catalytic converter thefts in various communities, including Hudson, Franklin, and Bellingham on September 13, 2022.

**BB. 9/20/22, Sudbury, MA**

180. According to Sudbury Police Report 22SUD-655-OF, on or about October 4, 2022, Sudbury Police received a report of a catalytic converter theft. Based upon review of the report, one vehicle was targeted and had its catalytic converter stolen. According to the report, Sudbury Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the theft taking

place at 4:30 AM on September 20, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video of the suspect vehicle recovered by Sudbury Police follow:



181. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incident.

- a. TARGET PHONE 1 utilized a cell tower in Sudbury, MA at 9:45 PM on September 19, 2022. The cell tower utilized by TARGET PHONE 1 was less than 3 miles from the location of the theft in Sudbury, MA.
- b. TARGET PHONE 1 utilized a cell tower in Acton, MA at 3:49 AM on September 20, 2022. The cell tower utilized by TARGET PHONE 1 was less than 6 miles from the location of the theft in Sudbury, MA.

182. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 8 utilized by Carlos FONSECA relative to the incident.

- a. TARGET PHONE 8 utilized a cell tower in Sudbury, MA at 4:16 AM, 4:30 AM, 4:33 AM, and 4:47 AM on September 20, 2022. The cell tower utilized by TARGET PHONE 8 was less than 3000 feet from the location of the theft in Sudbury, MA.

183. Investigators reviewed a “Note” drafted by Rafael DAVILA that appears to be a ledger of historical thefts. In the note, DAVILA wrote, “9-19-22 Woburn, Lexington, Bedford, action, west concord, Sudbury”. Investigators believe this is a note memorializing catalytic converter thefts in various

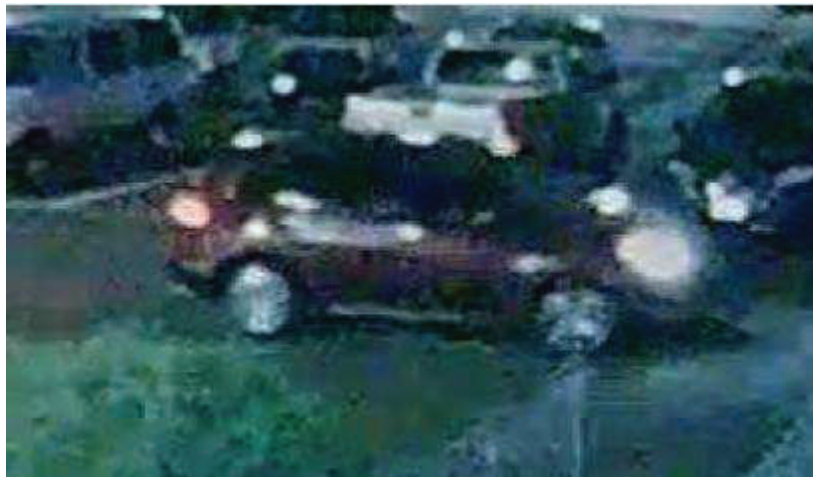
communities, including Sudbury committed on the evening of September 19, 2022 into the morning of September 20, 2022.

184. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FONSECA (utilizing TARGET PHONE 8) on September 19, 2022. Those text messages capture DAVILA and FONSECA meeting up at 11:10 PM before heading out to Sudbury, MA to commit the theft.

Date / Time	Author	Content
9/19/2022 10:55:26 PM	DAVILA	I'm on the way
9/19/2022 10:57:44 PM	FONSECA	Kool just finishing up
9/19/2022 10:58:59 PM	DAVILA	Ok coo
9/19/2022 11:06:37 PM	DAVILA	2 min away

**CC. 9/22/22, Wilmington, MA, Woburn, MA**

185. According to Wilmington Police Reports 22-1175-OF, 22-1176-OF, 22-1179-OF, and 22-1185-OF, on or about September 21, 2022, Wilmington Police received reports of catalytic converter thefts. Based upon review of the reports, a total of five vehicles were targeted and had their catalytic converters stolen. According to the reports, Wilmington Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at 1:34 AM on September 21, 2022.<sup>10</sup> This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video recovered by Wilmington Police follows:



<sup>10</sup> Investigators believe that this reported date is likely a scrivener's error and in fact should be September 22, 2022. Historical CSLI does not show any activity for TARGET PHONE 1 or TARGET PHONE 8 for September 21, 2022, but does have activity in Wilmington, MA and Woburn, MA on September 22, 2022.

186. According to Woburn Police Reports 22-1667-OF, and 22-1670-OF, on or about September 22, 2022, Woburn Police received reports of catalytic converter thefts. Based upon review of the reports, a total of six vehicles were targeted and had catalytic converters stolen. According to the reports, Woburn Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at 3:38 AM on September 22, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video recovered by Woburn Police follow:



187. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized cell towers in Wilmington, MA and Woburn, MA from 2:27 AM to approximately 4:40 AM, on September 22, 2022. The cell towers are less than 1 mile from the locations of the thefts in Wilmington, MA. Additionally, engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Wilmington, MA, and Woburn, MA.

188. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 8 utilized by Carlos FONSECA relative to the incidents.

- a. TARGET PHONE 8 utilized a cell tower in Woburn, MA at 2:48 AM on September 22, 2022. The cell tower is less than 2 miles from the locations of the thefts in Wilmington, MA.

189. Investigators reviewed a “Note” drafted by Rafael DAVILA that appears to be a ledger of historical thefts. In the note, DAVILA wrote, “9-21-22 finished Woburn and Wilmington”. Investigators believe this is a note memorializing catalytic converter thefts in various communities, including Woburn and Wilmington that were committed on September 22, 2022.

190. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FONSECA (utilizing TARGET PHONE 8) on September 21, 2022. Those text messages capture DAVILA and FONSECA meeting up at 11:35 PM before heading out to Wilmington, MA, and Woburn, MA to commit the thefts.

Date / Time	Author	Content
9/21/2022 8:35:24 PM	FONSECA	Same time brush
9/21/2022 8:35:28 PM	FONSECA	Brody
9/21/2022 8:35:40 PM	DAVILA	Yooo
9/21/2022 8:35:46 PM	DAVILA	Yessir
9/21/2022 8:35:51 PM	FONSECA	Ok kool
9/21/2022 10:15:26 PM	FONSECA	Ko just got up l'ma shower now and get ready
9/21/2022 10:15:42 PM	DAVILA	Ok coo
9/21/2022 11:30:18 PM	FONSECA	👊
9/21/2022 11:32:03 PM	DAVILA	Lmao l'm heading out now
9/21/2022 11:32:44 PM	FONSECA	Dale If I stay home any longer l'ma have to rub one out
9/21/2022 11:33:10 PM	DAVILA	Lmfao
9/21/2022 11:51:45 PM	DAVILA	About to pull up

#### **DD. 10/1/22, Home Depot Purchase**

191. Investigators obtained records and video footage from Home Depot. Review of those records revealed that on October 1, 2022, at 7:45 PM, DAVILA purchased thirty (30) 9-inch Diablo Sawzall blades (“Diablo 9” 8/10 TPI BI-M THK MTL 15PK”) and a gray neck-gaiter style mask for a total of \$117.95 at a Home Depot located in Enfield, Connecticut. DAVILA utilized self-checkout and paid \$118 in cash. After the purchase, surveillance video showed that DAVILA exited the store and entered a white BMW SUV and departed. Still images showing DAVILA purchasing the items follow:



**EE. 10/2/22, Billerica, MA, Methuen, MA, Ipswich, MA**

192. According to Billerica Police Reports 22-2167, 22-2168, and 22-2169, on or about October 3, 2022, Billerica Police received reports of catalytic converter thefts. Based upon review of the reports, a total of ten vehicles were targeted and had their catalytic converters stolen. According to the reports, Billerica Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 1:01 AM on October 2, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video recovered by Billerica Police follows:



193. According to Methuen Police Reports 2200026051 and 2200026055, on or about October 3, 2022, Methuen Police received reports of catalytic converter thefts taking place on October 2, 2022. Based upon review of the reports, a total of eight vehicles were targeted and had their catalytic converters stolen. According to the reports, Methuen Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts taking place at 3:15 AM on October 2, 2022. This vehicle appears to match the description of the MAROON ACURA MDX.

194. According to Ipswich Police Report 22IPS-1815-OF, on or about October 2, 2022, Ipswich Police received a report of catalytic converter thefts. Based upon review of the reports, a total of ten vehicles were targeted and had catalytic converters stolen. According to the report, Ipswich Police recovered

surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts taking place at approximately 4:13 AM on October 2, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video recovered by Ipswich Police follow:



195. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Billerica, MA at 1:04 AM and 1:36 AM on October 2, 2022. The cell tower is approximately 1 mile from the locations of the thefts in Billerica, MA. Additionally, engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Billerica, MA.
- b. TARGET PHONE 1 utilized a cell tower in Methuen, MA from 2:57 AM until 3:19 AM on October 2, 2022. The cell tower is approximately 500 feet from the location of the thefts in Methuen, MA. Additionally, engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Methuen, MA.
- c. TARGET PHONE 1 utilized a cell tower in Ipswich, MA at 3:52 AM, 4:19 AM, 4:21 AM, and 4:22 AM on October 2, 2022. The cell tower is approximately 1200 feet from the locations of the thefts in Ipswich, MA. Additionally, engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Ipswich, MA.

196. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 8 utilized by Carlos FONSECA relative to the incidents.

- a. TARGET PHONE 8 utilized a cell tower in Ipswich, MA at 4:18 AM on October 2, 2022. The cell tower is approximately 1200 feet from the locations of the thefts in Ipswich, MA.

197. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FONSECA (utilizing TARGET PHONE 8) on October 1, 2022 and October 2, 2022. Those text messages capture DAVILA and FONSECA meeting up at 12:24 AM before heading out to Billerica, MA,

Methuen, MA, and Ipswich, MA to commit the thefts.

Date / Time	Author	Content
10/1/2022 3:51:53 PM	DAVILA	Yoo we working tonight?
10/1/2022 6:39:41 PM	FONSECA	Got few things lined up my people coming down so ima waiting on them to get here if they get here early we out I just gotta drive to ct than I'll be back
10/1/2022 6:40:03 PM	DAVILA	Ok bro
10/1/2022 6:40:25 PM	FONSECA	I should be done by 9 30
10/1/2022 6:40:29 PM	FONSECA	Though
10/1/2022 6:40:42 PM	DAVILA	Ok bro
10/1/2022 9:07:09 PM	DAVILA	Lmk bro I'm getting the truck ready now
10/1/2022 9:07:51 PM	DAVILA	We don't have to leave till like 11
10/1/2022 9:08:05 PM	FONSECA	Im waiting on the call now to pick my friends up and k I should be done by than
10/1/2022 9:08:46 PM	DAVILA	Ok lmk as soon as you know for sure so I can bring my kids to my mom
10/1/2022 10:32:34 PM	FONSECA	Im heading home now to get changed
10/1/2022 10:32:57 PM	FONSECA	So 11?
10/1/2022 10:33:22 PM	DAVILA	Yes
10/1/2022 10:33:29 PM	FONSECA	Ok dale
10/1/2022 11:57:40 PM	FONSECA	Im coming out shower now so like 5 min
10/1/2022 11:57:48 PM	FONSECA	I was cleaning quick
10/2/2022 12:00:51 AM	DAVILA	Ok I'm on the way
10/2/2022 12:00:56 AM	FONSECA	K kool
10/2/2022 12:24:19 AM	DAVILA	Pulling up

**FF. 10/3/22, Home Depot Purchase**

198. Investigators obtained records and video footage from Home Depot. Review of those records revealed that on October 3, 2022, at 7:14 PM, DAVILA purchased thirty (30) 9-inch Diablo Sawzall blades (“Diablo 9” 8/10 TPI BI-M THK MTL 15PK”) for a total of \$101.94 at a Home Depot located in Westfield, MA. DAVILA paid \$105 in cash. After the purchase, surveillance video showed that DAVILA exited the store and entered the MAROON ACURA MDX and departed. A still image showing DAVILA purchasing the items and departing in the MAROON ACURA MDX follow:



**GG. 10/4/22, Londonderry, NH**

199. According to Londonderry, NH Police Report 22-1502-OF, on or about October 4, 2022, Londonderry, NH Police received a report of catalytic converter thefts. Based upon review of the report, a total of thirteen vehicles were targeted and had their catalytic converters stolen. According to the report, Londonderry, NH Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts taking place at 1:54 AM, and 2:24 AM on October 4, 2022.<sup>11</sup> This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video recovered by Londonderry, NH Police follows:

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<sup>11</sup> The vehicles targeted were Nissan NV200 vans, and the retail price for catalytic converters fitting this make/model van is \$4,168. *See* Product Details, Part #20010-3LM0A, [https://parts.nissanusa.com/p/nissan\\_NV200/Catalytic-Converter-Front/89433795/20010-3LM0A.html](https://parts.nissanusa.com/p/nissan_NV200/Catalytic-Converter-Front/89433795/20010-3LM0A.html) (accessed March 23, 2023).



200. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized cell towers in the Londonderry, NH area from 12:54 AM through 3:55 AM on October 4, 2022. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Londonderry, NH.
- b. Following the time frame of the thefts, TARGET PHONE 1 began utilizing cell towers consistent with travel into Massachusetts and back to Springfield, MA via I-495, I-290, and I-90. TARGET PHONE 1 began utilizing cell towers in Massachusetts at approximately 4:12 AM, and began utilizing cell towers in the Springfield, MA area at approximately 5:55 AM

201. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 8 utilized by Carlos FONSECA relative to the incidents.

- a. From 8:57 PM on October 3, 2022, TARGET PHONE 8 remained conspicuously off the network until 11:14 AM on October 4, 2022, when it utilized cell towers in the area of Springfield, MA.

202. Investigators reviewed a “Note” drafted by Rafael DAVILA that appears to be a ledger of historical thefts. In the note, DAVILA wrote, “10-5-22 Londonderry, south hooksett, Manchester nh”. Investigators believe this is a note memorializing catalytic converter thefts in various communities, including Londonderry in early October, 2022.

203. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FONSECA (utilizing TARGET PHONE 8) on October 3, 2022. Those text messages capture DAVILA and FONSECA meeting up around 11:00 PM before heading out to Londonderry, NH to commit the thefts.

Date / Time	Author	Content
10/3/2022 5:01:40 PM	DAVILA	Yoo I'm up
10/3/2022 5:01:48 PM	FONSECA	Nice lol
10/3/2022 5:02:14 PM	FONSECA	I been up since 7am at appointment with my kids lol
10/3/2022 5:02:21 PM	DAVILA	Wow
10/3/2022 5:02:49 PM	DAVILA	But I'm showering quick then I can meet you for your keys n stuff
10/3/2022 5:02:53 PM	FONSECA	I'ma nap soon to be rested for tonight if u around lmk so I can grab keys
10/3/2022 5:02:55 PM	FONSECA	Ok kool
10/3/2022 5:03:05 PM	FONSECA	Loved "But I'm showering quick then I can meet you for your keys n stuff"
10/3/2022 8:09:54 PM	DAVILA	Yoo we have to head out at 10
10/3/2022 8:10:19 PM	FONSECA	Ok
10/3/2022 10:55:00 PM	DAVILA	Yoo
10/3/2022 10:55:00 PM	DAVILA	Yoo
10/3/2022 10:56:50 PM	DAVILA	You ready?
10/3/2022 10:57:01 PM	FONSECA	Yea almost dressed
10/3/2022 10:57:12 PM	DAVILA	Ok cool
10/3/2022 11:00:47 PM	FONSECA	How far are u
10/3/2022 11:03:13 PM	DAVILA	Leaving home in two minutes

#### **HH. 11/24/22, Hooksett, NH**

204. According to Hooksett, NH Police Reports 22HKS-843-OF and 22HKS-854-OF, on or about November 24, 2022, Hooksett, NH Police received reports of catalytic converter thefts. Based upon review of the reports, a total of fourteen vehicles were targeted and had their catalytic converters stolen. According to the reports, Hooksett, NH Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts taking place at 3:16 AM on November 24, 2022.<sup>12</sup> This vehicle appears to match the description of the MAROON ACURA MDX. Of note, the suspects utilize a blue jack to lift the targeted vehicles. A still image from surveillance video recovered by Hooksett, NH Police follows:

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<sup>12</sup> During this incident, one of the vehicles targeted was a Nissan NV200. The catalytic converter for a Nissan NV200 carries a retail value of \$4,168. Eight of the vehicles targeted were Freightliner MT55 Vans from a bakery. Catalytic converters for a Freightliner MT55 Van carry a retail value of approximately \$3,000 each.



205. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Hooksett, NH from 1:59 AM to 3:58 AM on November 24, 2022. This cell tower is within 2500 feet from the locations of the thefts. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts.
- b. Following the time frame of the thefts in Hooksett, NH, TARGET PHONE 1 began utilizing cell towers consistent with travel into Massachusetts and back to Springfield, MA via I-495, I-290, and I-90. TARGET PHONE 1 began utilizing cell towers located in Massachusetts at approximately 5:15 AM, and began utilizing cell towers in the Springfield, MA area at approximately 7:00 AM on November 24, 2022.

206. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 6 utilized by Nicolas DAVILA relative to the incidents.

- a. TARGET PHONE 6 utilized a cell tower in Hooksett, NH from 1:58 AM to 3:57 AM on November 24, 2022. This cell tower is within 2500 feet from the locations of the thefts. Engineering data for TARGET PHONE 6 placed it in the immediate vicinity of the locations of the thefts.
- b. Following the time frame of the thefts in Hooksett, NH, TARGET PHONE 6 began utilizing cell towers consistent with travel into Massachusetts and back to Springfield, MA via I-495, I-290, and I-90. TARGET PHONE 6 began utilizing cell towers located in Massachusetts at approximately 5:18 AM, and began utilizing cell towers in the Springfield, MA area at approximately 7:00 AM on November 24, 2022.

207. Investigators reviewed text messages between Rafael DAVILA (utilizing TARGET PHONE 1) and Nicolas DAVILA (utilizing TARGET PHONE 6) on November 23, 2022. Those text messages capture Rafael DAVILA and Nicolas DAVILA meeting up around 10:47 PM before heading out to Hooksett, NH to commit the thefts. Of note, DAVILA indicates that the individual with whom he had planned to commit the thefts – “Charlito”, believed to be FONSECA – could not “work” that night. Rafael DAVILA also indicates that he has additional locations identified for Saturday, November 26, 2022, as well, suggesting that Nicolas DAVILA can come along that evening if “Charlito” (meaning FONSECA) is not available.

Date / Time	Author	Content
11/23/2022 5:58:42 PM	DAVILA	You have plans tonight?
11/23/2022 6:19:53 PM	Nicolas DAVILA	No not really I'm bouta get up now
11/23/2022 6:19:57 PM	Nicolas DAVILA	Why what's good bro
11/23/2022 6:28:25 PM	DAVILA	I got a good spot in NH I think there gonna be closed tonight. I was supposed to go with Charlito but he can't work tonight
11/23/2022 6:29:39 PM	Nicolas DAVILA	I'm down for whatever
11/23/2022 6:29:51 PM	Nicolas DAVILA	Just lmk I got no plans
11/23/2022 6:30:17 PM	DAVILA	I'm going for sure
11/23/2022 6:30:34 PM	DAVILA	And if he slack on Saturday I got a spot for Saturday too
11/23/2022 6:31:28 PM	Nicolas DAVILA	Okay what time you can grab me whenever
11/23/2022 6:32:18 PM	DAVILA	Gotta head out at like 10
11/23/2022 6:34:53 PM	Nicolas DAVILA	Ight cool
11/23/2022 9:49:07 PM	DAVILA	I'm getting home now. Gonna change a grab my truck and I'm on the way to get you
11/23/2022 9:50:50 PM	Nicolas DAVILA	Okay on island pond rd driving home
11/23/2022 9:51:13 PM	DAVILA	Ok
11/23/2022 10:30:08 PM	Nicolas DAVILA	You good?
11/23/2022 10:30:42 PM	DAVILA	Yea just filled up the tank. I'm on the way
11/23/2022 10:31:30 PM	Nicolas DAVILA	Alrighty
11/23/2022 10:47:37 PM	DAVILA	Here
11/23/2022 10:48:46 PM	Nicolas DAVILA	Coming

## **II. 11/27/22, Wilmington, MA, Millbury, MA**

208. According to Wilmington Police Reports 22-1416-OF, 22-1417-OF, and 22-1418-OF, on or about November 27, 2022, Wilmington Police received reports of catalytic converter thefts. Based upon review of the reports, a total of ten vehicles were targeted and had their catalytic converters stolen. According to the reports, Wilmington Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts taking place at 1:57 AM on November 27, 2022. This

vehicle appears to match the description of the MAROON ACURA MDX. Of note, one of the suspects appears to be wearing a blue head lamp and red gloves, and sneakers with silver piping. Still images from surveillance video recovered by Wilmington Police follows:



209. According to Millbury Police Report 22-587-OF, on or about November 27, 2022, Millbury Police received a report of catalytic converter thefts. Based upon review of the report, three vehicles were targeted and had their catalytic converters stolen. A fourth vehicle was found to have a red Diablo Sawzall blade embedded in its exhaust pipe. According to the report, Millbury Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 5:35 AM on November 27, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video reviewed by Millbury Police follows:



210. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Wilmington, MA from 1:46 AM to 4:10 AM on November 27, 2022. This cell tower is within 1500 feet from the locations of the thefts in Wilmington, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Wilmington, MA.
- b. TARGET PHONE 1 utilized a cell tower in Millbury, MA from 5:16 AM to 6:22 AM on November 27, 2022. This cell tower is within 2000 feet from the locations of the thefts in Millbury, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Millbury, MA.

211. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 6 utilized by Nicolas DAVILA relative to the incidents.

- a. TARGET PHONE 6 utilized cell towers in Wilmington, MA from 1:46 AM to 4:11 AM on November 27, 2022. This cell towers are within 1 mile from the locations of the thefts in Wilmington, MA. Engineering data for TARGET PHONE 6 placed it in the immediate vicinity of the locations of the thefts in Wilmington, MA.
- b. TARGET PHONE 6 utilized a cell tower in Millbury, MA from 5:10 AM to 6:18 AM on November 27, 2022. This cell tower is within 2000 feet from the locations of the thefts in Millbury, MA. Engineering data for TARGET PHONE 6 placed it in the immediate vicinity of the locations of the thefts in Millbury, MA.

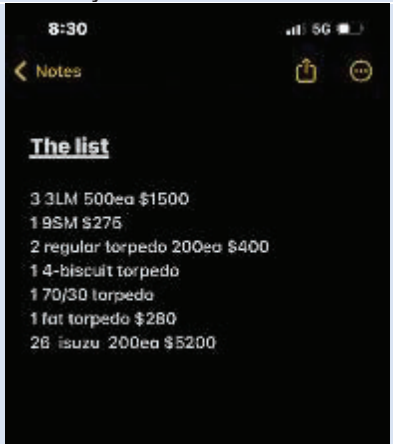
212. Investigators reviewed text messages between Rafael DAVILA (utilizing TARGET PHONE 1) and Nicolas DAVILA (utilizing TARGET PHONE 6) on November 26, 2022. Those text messages capture Rafael DAVILA and Nicolas DAVILA meeting up around 11:56 PM before heading out

to Wilmington, MA, and Millbury, MA to commit the thefts. Of note, in this conversation, Rafael DAVILA and Nicolas DAVILA discuss Home Depot, and obtaining gloves for Nicolas DAVILA to use.

Date / Time	Author	Content
11/26/2022 7:33:33 PM	DAVILA	You get gloves yet? I'm at Home Depot
11/26/2022 7:33:42 PM	Nicolas DAVILA	No I didn't
11/26/2022 7:33:51 PM	Nicolas DAVILA	I only got the ones in the truck the fox ones
11/26/2022 7:34:20 PM	DAVILA	I'll grab you some good ones
11/26/2022 7:37:22 PM	Nicolas DAVILA	Okay thank you
11/26/2022 11:24:43 PM	Nicolas DAVILA	I'm bouta put gas in moms truck real quick it's on E
11/26/2022 11:44:51 PM	DAVILA	I'm heading there now. I'll be there in 15 min
11/26/2022 11:45:05 PM	Nicolas DAVILA	Ight I'll be there
11/26/2022 11:56:08 PM	Nicolas DAVILA	Here last row
11/26/2022 11:56:24 PM	DAVILA	Ok

213. Investigators reviewed text messages between Rafael DAVILA (utilizing TARGET PHONE 1) and Nicolas DAVILA (utilizing TARGET PHONE 6) on November 28, 2022, after the thefts on November 27, 2022 has taken place. During this conversation, Rafael DAVILA and N. DAVILA discuss the monetization of the stolen catalytic converters referring to them as “pieces.” Rafael DAVILA indicates he dropped the catalytic converters off to an individual at Jose TORRES’ direction (“going through some OG Goldy knows”), and that TORRES is charging a fee to be the middle-man (“in the mix making his cut”). During the conversation, they also discuss waiting on a set of false identification for Rafael DAVILA to use with a catalytic converter buyer in Rhode Island that will buy their stolen catalytic converters. (“As soon as it comes in I’m gonna shoot down to Rhode Island.”). DAVILA also tells Nicolas DAVILA that after they “check this last town out” they will start over again, and the next group of targeted locations will give them four to six months of locations to target for catalytic converters twice a week (“After we check this last town out we gonna do something different so like starting all over again. My next group should give us a good 4-6 months of work twice a week.”).

Date / Time	Author	Content
11/28/2022 6:19:12 PM	Nicolas DAVILA	Everything good?
11/28/2022 6:21:07 PM	DAVILA	Yes. I dropped some pieces off to the dude, he said he can only buy like \$5k worth at a time. When I got there he said I could've brought more 🙄
11/28/2022 6:21:34 PM	Nicolas DAVILA	Wow lol
11/28/2022 6:21:45 PM	Nicolas DAVILA	Always something
11/28/2022 6:21:48 PM	Nicolas DAVILA	You got the ID?
11/28/2022 6:22:01 PM	DAVILA	So I'm gonna bring more to him tonight and he said he'll have money for them tomorrow evening.

11/28/2022 6:22:15 PM	Nicolas DAVILA	Okay cool that's what's up just checkin on you
11/28/2022 6:22:30 PM	DAVILA	No I'm going through some OG Goldy knows
11/28/2022 6:22:42 PM	DAVILA	I can't wait for that ID to come in.
11/28/2022 6:23:01 PM	Nicolas DAVILA	Oh okay got ya
11/28/2022 6:23:05 PM	Nicolas DAVILA	That shit taking long
11/28/2022 6:23:11 PM	DAVILA	As soon as it comes in I'm gonna shoot down to Rhode Island.
11/28/2022 8:15:52 PM	DAVILA	So I dropped off the whole first round. If everything goes good we'll have the money tomorrow evening. hopefully my plates land on time and we'll work again on Wednesday
11/28/2022 8:17:30 PM	Nicolas DAVILA	Okay sounds good
11/28/2022 8:18:50 PM	Nicolas DAVILA	Did goldy tax you ? Lol
11/28/2022 8:19:36 PM	DAVILA	He still in the mix making his cut
11/28/2022 8:20:06 PM	Nicolas DAVILA	Oh okay word
11/28/2022 8:31:12 PM	DAVILA	
11/28/2022 8:32:22 PM	DAVILA	This is were we are so far more or less. Just waiting on prices for those last two torpedos
11/28/2022 8:35:20 PM	DAVILA	Which are the two more expensive ones so not a bad night
11/28/2022 8:37:10 PM	Nicolas DAVILA	Word that's not bad at all fuck it we ain't done turning up yet lol
11/28/2022 8:38:37 PM	Nicolas DAVILA	Hopefully the plates come in lol
11/28/2022 8:40:52 PM	DAVILA	After we check this last town out we gonna do something different so like starting all over again. My next group should give us a good 4-6 months of work twice a week.
11/28/2022 8:41:21 PM	Nicolas DAVILA	Okay got it
11/28/2022 8:41:39 PM	Nicolas DAVILA	Im ready for whatever

## JJ. 12/05/22, Home Depot Purchase

214. Investigators obtained records and video footage from Home Depot. Review of those records revealed that on December 5, 2022, at 8:37 PM, DAVILA purchased thirty (30) 9-inch Diablo Sawzall blades (“Diablo 9” 8/10 TPI BI-M THK MTL 15PK”) for a total of \$101.94 at a Home Depot located in Westfield, Massachusetts. DAVILA utilized self-checkout and paid \$110 in cash. Of note, DAVILA can be seen wearing black clothing, a black jacket, and a black Adidas hat. After the purchase,

surveillance video showed that DAVILA exited the store and entered a black Chevrolet Suburban and departed the area. A still image showing DAVILA exiting the Home Depot and the black Chevrolet Suburban follows:



**KK. 12/06/22, Concord, NH and Bow, NH**

215. According to Concord, NH Police Report 22-1502-OF, on or about December 6, 2022, Concord, NH Police received reports of catalytic converter thefts. Based upon review of the reports, a total of fourteen vehicles were targeted and had their catalytic converters stolen.<sup>13</sup> According to the report, Concord, NH Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts taking place at 1:30 AM to 4:00 AM on December 6, 2022. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts. Still images from surveillance video recovered by Concord, NH Police follows:

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<sup>13</sup> Eight of the vehicles targeted were Ford E450 vans. The catalytic converters for a Ford E450 van carry a retail value of at least \$1,000 each.



216. According to Bow, NH Police Report 22-1502-OF, on or about December 6, Bow, NH Police received a report of a catalytic converter theft. Based upon review of the report, one vehicle was targeted and had its catalytic converter stolen. According to the report, Bow, NH Police recovered surveillance video in the area of the theft and were able to identify a vehicle involved in the thefts at approximately 4:10 AM on December 6, 2022. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in this theft. Still images from surveillance video recovered by Bow, NH Police follow:



217. Investigators obtained surveillance video from the Hilton Hotel located at the Basketball Hall of Fame in Springfield, MA for December 5, 2022, and December 6, 2022. Investigators also obtained surveillance video from a gas station in Chelmsford, MA, on December 6, 2022, where the MAROON ACURA MDX stopped at 12:12 AM, and a gas station in Merrimack, NH, where the MAROON ACURA MDX stopped at 5:30 AM on December 6, 2022, after the thefts in Bow, NH and Concord, NH.

- a. At approximately 10:31 PM on December 5, 2022, the MAROON ACURA MDX parked in the parking lot. A few minutes later, a dark Lexus SUV, bearing Mass. Reg. 7TP872, arrives at 10:34 PM. Investigators know that this vehicle is utilized by N. DAVILA. A male, believed to be N. DAVILA exited the driver's seat of the Lexus and entered the front passenger seat of the MAROON ACURA MDX.
- b. At approximately 12:15 AM on December 6, 2022, the MAROON ACURA MDX arrived at a Shell Gas Station in Chelmsford, MA. The surveillance video showed that R. DAVILA exited the driver's seat of the MAROON ACURA MDX and entered the convenience store. R. DAVILA is wearing black clothing and a black Adidas hat. Still images from the surveillance video follow:



- c. At approximately 5:34 AM on December 6, 2022, after the thefts in Concord and Bow, NH, the MAROON ACURA MDX arrived at the Rapid Refill Gas Station in Merrimack, NH. The surveillance video showed that R. DAVILA exited the driver's seat and N. DAVILA exited the passenger seat the MAROON ACURA MDX. Both entered the associated convenience store. N. DAVILA can be observed wearing a black hat with a sticker on the brim. Still images from the surveillance video follow:



- d. Video from Hilton on December 6, 2022 (07:20 AM to 07:30 AM) showed that the MAROON ACURA MDX arrived in the BHOF parking lot at approximately 7:23 AM and parks next to the Lexus (the Lexus had not moved). A male, believed to be N. DAVILA wearing the hat with sticker on the brim, exited the passenger side of the MAROON ACURA MDX and entered into the Lexus. Both vehicles then leave the BHOF parking lot heading west on West Union Street in Springfield, MA.



218. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Chelmsford, MA at 12:15 AM on December 6, 2022. This cell tower is within 5000 feet from the Shell Gas Station. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the Shell Gas Station.
- b. TARGET PHONE 1 utilized cell towers in Concord, NH, MA from 1:00 AM to 4:00 AM on December 6, 2022. The cell towers are within 4 miles from the locations of the thefts in Concord, NH. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Concord, NH.
- c. TARGET PHONE 1 utilized a cell tower in Bow, NH at 4:08, 4:17 AM, 4:18 AM, 4:19 AM, 4:32 AM, 4:33 AM and 4:35 AM on December 6, 2022. This cell tower is within 1.5 miles from the location of the theft in Bow, NH. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Bow, NH.
- d. TARGET PHONE 1 utilized a cell tower in Merrimack, NH at 5:23 AM to 5:31 AM on December 6, 2022. This cell tower is within 5000 feet from the gas station in Merrimack, NH. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the gas station in Merrimack, NH.
- e. Following the stop in Merrimack, NH, TARGET PHONE 1 began utilizing cell towers consistent with travel into Massachusetts and back to Springfield, MA via Route 3, I-495, I-290, and I-90. TARGET PHONE 1 began utilizing cell towers located in Massachusetts at approximately 5:54 AM, and began utilizing cell towers in the Springfield, MA area at approximately 7:15 AM, on December 6, 2022.
- f. TARGET PHONE 6 utilized a cell tower in Springfield, MA at 7:23 AM on December 6, 2022. This cell tower is within 3000 feet from the Basketball Hall of Fame parking lot.

Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the Basketball Hall of Fame parking lot.

219. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 6 utilized by Nicolas DAVILA relative to the incidents.

- a. TARGET PHONE 6 utilized a cell tower in Springfield, MA at 10:38 PM on December 5, 2022. This cell tower is within 3000 feet from the Basketball Hall of Fame parking lot. Engineering data for TARGET PHONE 6 placed it in the immediate vicinity of the Basketball Hall of Fame parking lot.
- b. TARGET PHONE 6 utilized a cell tower in Chelmsford, MA at 12:13 AM on December 6, 2022. This cell tower is within 5000 feet from the Shell Gas Station. Engineering data for TARGET PHONE 6 placed it in the immediate vicinity of the Shell Gas Station.
- c. TARGET PHONE 6 utilized cell towers in Concord, NH, MA from 1:00 AM to 4:00 AM on December 6, 2022. The cell towers are within 4 miles from the locations of the thefts in Concord, NH. Engineering data for TARGET PHONE 6 placed it in the immediate vicinity of the locations of the thefts in Concord, NH.
- d. TARGET PHONE 6 utilized a cell tower in Bow, NH at 4:11 AM and 4:28 AM on December 6, 2022. This cell tower is within 3000 feet from the locations of the thefts in Bow, NH. Engineering data for TARGET PHONE 6 placed it in the immediate vicinity of the locations of the thefts in Bow, NH.
- e. TARGET PHONE 6 utilized a cell tower in Merrimack, NH at 5:23 AM, 5:25 AM, 5:26 AM, 5:29 AM, 5:30 AM, and 5:43 AM December 6, 2022. This cell tower is within 5000 feet from the gas station in Merrimack, NH. Engineering data for TARGET PHONE 6 placed it in the immediate vicinity of the gas station in Merrimack, NH.
- f. Following the stop in Merrimack, NH, TARGET PHONE 6 began utilizing cell towers consistent with travel into Massachusetts and back to Springfield, MA via Route 3, I-495, I-290, and I-90. TARGET PHONE 6 began utilizing cell towers located in Massachusetts at approximately 5:59 AM, and began utilizing cell towers in the Springfield, MA area at approximately 7:15 AM on December 6, 2022.
- g. TARGET PHONE 6 utilized a cell tower in Springfield, MA at 7:24 AM on December 6, 2022. This cell tower is within 3000 feet from the Basketball Hall of Fame parking lot. Engineering data for TARGET PHONE 6 placed it in the immediate vicinity of the Basketball Hall of Fame parking lot.

220. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and Nicolas DAVILA (utilizing TARGET PHONE 6) on December 5, 2022. Those text messages capture DAVILA and Nicolas DAVILA meeting up at the Basketball Hall of Fame around 10:30 PM before heading out to Concord, NH and Bow, NH to commit the thefts.

Date / Time	Author	Content
12/5/2022 8:16:25 PM	DAVILA	9:30-9:45?
12/5/2022 8:51:59 PM	Nicolas DAVILA	That's fine
12/5/2022 9:00:42 PM	DAVILA	Ok I'll let you know when I'm on the way
12/5/2022 10:12:41 PM	Nicolas DAVILA	Okay I'm ready
12/5/2022 10:15:19 PM	DAVILA	I'm about to be on the way
12/5/2022 10:17:13 PM	Nicolas DAVILA	Alright
12/5/2022 10:20:01 PM	DAVILA	I'll be at the hall of fame if 15
12/5/2022 10:30:53 PM	Nicolas DAVILA	Pullin up to it

221. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and Nicolas DAVILA (utilizing TARGET PHONE 6) on December 6, 2022, and December 8, 2022. Those text messages capture DAVILA and Nicolas DAVILA discussing monetization of the stolen catalytic converters.

Date / Time	Author	Content
12/6/2022 5:33:26 PM	DAVILA	The guy is gonna be here at 9 to pick up Saturdays load so we should get paid buy tomorrow night then I'll send yesterdays load
12/6/2022 7:37:17 PM	Nicolas DAVILA	Okay thank you bro and word
12/8/2022 10:31:12 PM	DAVILA	I still have Monday. Im not sending until they're ready
12/9/2022 10:20:31 AM	Nicolas DAVILA	Hey I seen your message but I was doing so bad I couldn't even use my phone yesterday mom and dad took me to urgent care. I'm negative on COVID but I got a bad flu and stomach bug I guess. I'm doing better today though. Thank god.
12/15/2022 10:05:45 PM	DAVILA	Remember we still have 13 pieces from that round put away
12/15/2022 10:08:13 PM	DAVILA	Yea definitely even with market down that gonna be a \$4k night each not fuckin bad
12/15/2022 10:08:33 PM	DAVILA	I'm dropping the money off to moms in 15 minutes

**LL. 12/21/22, Manchester, NH**

222. According to Manchester, NH Police Report 22-020230, on or about December 21, 2022, Manchester, NH Police received a report of a catalytic converter theft. Based upon review of the report, one vehicle was targeted and had its catalytic converter stolen. According to the report, Manchester, NH Police recovered surveillance video in the area of the theft and were able to identify a vehicle involved in the theft at approximately 1:40 AM on December 21, 2022. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in this theft. According to the report, the vehicle owner observed two individuals appearing to break into his vehicle. Upon observing this, the vehicle owner exited his residence and smashed the rear windshield of the vehicle with a baseball bat. The vehicle then it

departed the area. The catalytic converter from the targeted vehicle had already been stolen. Investigators are aware from historical GPS tracking data that the MAROON ACURA MDX reached more than 100 mph as it fled the scene and travelled to the residence of Santo FELIBERTY on Parker Street in Springfield, MA. A still image from surveillance video recovered by Manchester, NH Police follows:



223. Investigators learned that the MAROON ACURA MDX travelled from Manchester, NH to FELIBERTY's residence on Parker Street in Springfield, MA, following the destruction of the rear window. Investigators conducted surveillance and observed the MAROON ACURA MDX was reversed in and parked next to a free-standing garage with the broken rear window not visible from the street.

224. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incident.<sup>14</sup>

- a. TARGET PHONE 1 utilized a cell tower in Springfield, MA at 10:21 PM on December 20, 2022. This cell tower is within 1700 feet of FELIBERTY's Parker Street address. Engineering data for TARGET PHONE 1 shows it to be in the immediate vicinity of FELIBERTY's Parker Street address.
- b. TARGET PHONE 1 utilized a cell tower in Manchester, NH at 1:33 AM, 1:34 AM, 1:35 AM, 1:36 AM, on December 21, 2022. This cell tower is within 1300 feet from the locations of the theft in Manchester, NH. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the location of the theft in Manchester, NH.

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<sup>14</sup> A review of Rafael Davila's telephone toll records associated with the telephone number, 413-355-6609, revealed that Rafael Davila placed two (2) outgoing telephone calls to Wizard Auto Glass on the morning of December 21, 2022, at 9:08:43 a.m. and 9:14:34 a.m. Rafael Davila received one (1) incoming telephone call from Wizard Auto Glass on December 21, 2022, at 2:14:41 p.m.

- c. TARGET PHONE 1 utilized a cell tower in Springfield, MA at 3:20 AM on December 21, 2022. This cell tower is within 3000 feet of FELIBERTY's Parker Street address. Engineering data for TARGET PHONE 1 shows it to be in the immediate vicinity of FELIBERTY's Parker Street address.

225. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 10 utilized by Santo FELIBERTY relative to the incidents.

- a. TARGET PHONE 10 utilized a cell tower in Springfield, MA at 10:23 PM on December 20, 2022. This cell tower is within 3000 feet of FELIBERTY's Parker Street address.
- b. TARGET PHONE 10 utilized a cell tower in Manchester, NH at 1:28, 1:38 AM, 1:39 AM and 1:40 AM, on December 21, 2022. This cell tower is within 1300 feet from the locations of the theft in Manchester, NH. Engineering data for TARGET PHONE 10 placed it in the immediate vicinity of the location of the theft in Manchester, NH.
- c. TARGET PHONE 10 utilized a cell tower in Springfield, MA at 3:21 AM on December 21, 2022. This cell tower is within 3000 feet of FELIBERTY's Parker Street address.

**MM. 12/28/22, Home Depot Purchase**

226. Investigators obtained records and video footage from Home Depot. Review of those records revealed that on December 28, 2022, at 8:37 PM, DAVILA purchased fifteen (15) 9-inch Diablo Sawzall blades ("Diablo 9" 8/10 TPI BI-M THK MTL 15PK") for a total of \$54.16 at a Home Depot located in Westfield, Massachusetts. DAVILA utilized self-checkout and paid \$60 in cash. Of note, DAVILA can be seen wearing black clothing, a black jacket, and a black Adidas hat. After the purchase, surveillance video showed that DAVILA exited the store and entered a black pickup truck with an extended cab and silver detail around the windows, consistent with a Dodge Ram, and departed the area. A still image showing DAVILA exiting the Home Depot and the pickup truck follows:



**NN. 12/29/22, Easthampton, MA, Holyoke, MA**

227. According to Easthampton Police Reports 22-944-OF and 22-944-OF, on or about December 28, 2022, Easthampton Police received reports of catalytic converter thefts. Based upon review of the reports, two vehicles were targeted and had their catalytic converters stolen. According to the reports, Easthampton Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 1:45 AM on December 29, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in this theft. A still image from surveillance video recovered by Easthampton Police follows:



228. According to Holyoke Police Report 22-6319-OF, on or about December 29, 2022, Holyoke Police received a report of a catalytic converter theft. Based upon review of the report, one vehicle was targeted and had its catalytic converters stolen. According to the report, Holyoke Police recovered surveillance video in the area of the theft and were able to identify a vehicle involved in the theft at approximately 4:46 AM on December 29, 2022. This vehicle appears to match the description of the MAROON ACURA MDX. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in this theft. A still image from surveillance video recovered by Holyoke Police follows:



229. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Easthampton, MA at 12:42 AM, on December 29, 2022. This cell tower is within 1 mile from the locations of the thefts in Easthampton, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Easthampton, MA.
- b. TARGET PHONE 1 utilized a cell tower in Easthampton, MA from 3:58 AM to 4:20 AM on December 29, 2022. This cell tower is within 300 feet from the location of the theft in Holyoke, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the location of the theft in Holyoke, MA.

**OO. 1/5/23, Framingham, MA**

230. According to Framingham Police Reports 22-006094, 23-000088, 23-000101, 23-000104, 23-000113, 23-000115, 23-000131, 23-000132, 23-000152, 23-000154, and 23-000197, on or about January 5, 2023, Framingham Police received reports of catalytic converter thefts. Based upon review of the reports, nine vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts.

231. Investigators obtained surveillance video from the Charlton area westbound rest stop on I-90. Surveillance video depicts DAVILA entering the associated convenience store, proceeding through to the McDonald's, making a purchase, and then exiting within two minutes. Still images of DAVILA entering and exiting the Charlton rest area follow:



232. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized cell towers in Framingham, MA from approximately 1:00 AM to 4:50 AM, on January 5, 2023. The cell towers are within 2 miles from the locations of the thefts in Framingham, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Framingham, MA.
- b. TARGET PHONE 1 utilized a cell tower in Charlton, MA 5:23 AM, 5:24 AM, 5:25 AM, 5:26 AM, 5:27 AM, and 5:28 AM on January 5, 2023. The cell tower is within 900 feet from the Charlton westbound rest stop.

233. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 10 utilized by Santo FELIBERTY relative to the incidents.

- a. TARGET PHONE 10 utilized cell towers in Framingham, MA from approximately 1:00 AM to 4:50 AM, on January 5, 2023. The cell towers are within 2 miles from the locations of the thefts in Framingham, MA. Network locational data for TARGET PHONE 10 placed it in the immediate vicinity of the locations of the thefts in Framingham, MA.

234. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FELIBERTY (utilizing TARGET PHONE 5) on January 4, 2023. Those text messages capture DAVILA and FELIBERTY meeting up at around 10:30 PM before heading out to Framingham, MA to commit the thefts.

Date/Time	Author	Content
1/4/2023 8:53:19 PM	DAVILA	Yoo what time you thinkin?
1/4/2023 8:54:02 PM	FELIBERTY	I'm eating then getting dressed
1/4/2023 8:54:16 PM	FELIBERTY	I'll be ready in 30
1/4/2023 8:54:28 PM	DAVILA	Ok just checkin in. No rush. I'm home
1/4/2023 10:31:13 PM	DAVILA	2 min away
1/4/2023 10:31:30 PM	FELIBERTY	Ok

**PP. 1/9/23, Worcester, MA**

235. According to Worcester Police Reports 2023-2490, 2023-2492, 2023-2499, 2023-2564, 2023-2566, 2023-2571, 2023-2573, 2023-2579, 2023-2586, 2023-2602, 2023-2605, 2023-2611, 2023-2666, 2023-2752 on or about January 9, 2023, Worcester Police received reports of catalytic converter thefts. Based upon review of the reports, a total of thirteen vehicles were targeted and had their catalytic converters stolen. According to the reports, Worcester Police recovered surveillance video in the area of

the thefts and were able to identify a dark-colored minivan involved in the thefts at approximately 1:25 AM on January 9, 2023. This vehicle appears to match the description of the minivan seen at DAVILA's residence, and utilized by DAVILA, FELIBERTY, and OYOLA, on January 10, 2023, in relation to two jewelry store burglaries, and discussed below.



236. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized cell towers in Worcester, MA from approximately 1:00 AM to 4:20 AM, on January 9, 2023. The cell towers are within 2 miles from the locations of the thefts in Worcester, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Worcester, MA.

237. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 10 utilized by Santo FELIBERTY relative to the incidents.

- a. TARGET PHONE 10 utilized cell towers in Worcester, MA from 1:05 AM to 4:20 AM, on January 9, 2023. The cell towers are within 2 miles from the locations of the thefts in Worcester, MA. Network location data for TARGET PHONE 10 placed it in the immediate vicinity of the locations of the thefts in Worcester, MA.

238. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FELIBERTY (utilizing TARGET PHONE 5) on January 8, 2023. Those text messages capture DAVILA and FELIBERTY meeting up at around 10:00 PM before heading out to Worcester, MA to commit the thefts. Of note, they discuss utilizing a “van” that FELIBERTY has access to in order to commit the thefts. As discussed above, the Worcester Police recovered video depicting a van being involved in the

thefts.

Date/Time	Author	Content
1/8/2023 3:38:44 PM	DAVILA	I'm in the movies
1/8/2023 3:39:21 PM	FELIBERTY	Just making sure we on today. Enjoy the movie. Stay away from butter beat offs 🤔
1/8/2023 3:39:38 PM	DAVILA	Lmao
1/8/2023 3:39:46 PM	DAVILA	Yea we on for sure
1/8/2023 8:51:28 PM	DAVILA	Can you take the van?
1/8/2023 8:52:39 PM	FELIBERTY	It might need two front tires. Idk if my sister ever put them on.
1/8/2023 8:53:17 PM	FELIBERTY	We can snag 2 if she didn't 🤔
1/8/2023 8:53:27 PM	DAVILA	Ok up to you
1/8/2023 8:54:03 PM	DAVILA	I just haven't talked to this nigga dont know where he at with my truck but I can track him down
1/8/2023 8:54:58 PM	FELIBERTY	Lol ok let him be I'll go get the van but if she didn't swap the tires we definitely need to snag two because they were on the wire
1/8/2023 8:57:58 PM	DAVILA	Oh shit ok
1/8/2023 9:49:46 PM	FELIBERTY	Leaving the yoke

#### **QQ. 1/19/23, Fitchburg, MA and Leominster, MA**

239. According to Fitchburg Police Reports 23-2718-OF, 23-2736-OF, 23-2737-OF, 23-2745-OF, 23-2771-OF, 23-2787-OF, 23-2950-OF, and 23-3103-OF, on or about January 19, 2023, Fitchburg Police received reports of catalytic converter thefts. Based upon review of the reports, a total of eight vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts. According to the reports, Fitchburg Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 1:20 AM on January 19, 2023. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video recovered by Fitchburg Police follows:



240. According to Leominster Police Report 23-2711-OF, on or about January 19, 2023, Leominster Police received a report of a catalytic converter theft. Based upon review of the report, one vehicle was targeted and had its catalytic converter stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in this theft.

241. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized cell towers in Fitchburg, MA from approximately 12:47 AM to 3:50 AM, on January 19, 2023. These cell towers are within 1 mile from the locations of the thefts in Fitchburg, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Fitchburg, MA.
- b. TARGET PHONE 1 utilized cell towers in Leominster, MA from approximately 3:53 AM to 4:40 AM, on January 19, 2023. The cell towers are within 2 miles from the location of the theft in Leominster, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the location of the theft in Leominster, MA.

242. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 7 utilized by Zachary MARSHALL relative to the incidents.

- a. TARGET PHONE 7 utilized cell towers in Fitchburg, MA from approximately 12:45 AM to 3:50 AM, on January 19, 2023. The cell towers are within 1 mile from the locations of the thefts in Fitchburg, MA. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the locations of the thefts in Fitchburg, MA.
- b. TARGET PHONE 7 utilized cell towers in Leominster, MA from approximately 3:53 AM to 4:40 AM, on January 19, 2023. The cell towers are within 2 miles from the location of the theft in Leominster, MA. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the location of the theft in Leominster, MA.

243. Investigators learned that the MAROON ACURA MDX stopped at the Charlton I-90 westbound service plaza at approximately 5:15 AM on January 19, 2023. Investigators obtained surveillance video from the Charlton service area that depicted DAVILA and MARSHALL entering the plaza at the time. It is of note that DAVILA was wearing the same clothing (Adidas hat and black shirt with white writing) as previously observed during other thefts. A still image from the Charlton service plaza video on January 19, 2023, follows depicting MARSHALL in gray (left) and DAVILA in black (right):



244. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and MARSHALL (utilizing TARGET PHONE 7) on January 18, 2023. Those text messages capture DAVILA and MARSHALL meeting up at around 11:15 PM before heading out to Leominster, MA and Fitchburg, MA to commit the thefts.

Date/Time	Author	Content
1/18/2023 10:36:23 PM	DAVILA	Where am I picking you up?
1/18/2023 10:36:40 PM	MARSHALL	I was bout drive to Jorge's crib but I'm at the bakery
1/18/2023 10:39:15 PM	DAVILA	I don't wanna be too far off the highway when we get back
1/18/2023 10:39:33 PM	MARSHALL	So we're you want me to go I'm at the bakery I can meet were ever though
1/18/2023 10:40:04 PM	DAVILA	Hall of fame on the hotel side.
1/18/2023 10:40:47 PM	DAVILA	I'm still home leaving in 5 min then I have to stop for gas
1/18/2023 10:40:52 PM	MARSHALL	Ok when you want me to go
1/18/2023 10:41:02 PM	DAVILA	So probably like 20-25 min I'll be there
1/18/2023 10:41:12 PM	MARSHALL	Ok so I be over there
1/18/2023 10:45:01 PM	DAVILA	Ok
1/18/2023 11:10:52 PM	DAVILA	I'm pulling up

1/18/2023 11:11:16 PM MARSHALL Aight I'm here in like middle parking lot

**RR. 1/26/23, Abington, MA and Weymouth, MA**

245. According to Weymouth Police Reports 23-310-OF and 23-313-OF, on or about January 26, 2023, Weymouth Police received reports of catalytic converter thefts. Based upon review of the reports, two vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts.

246. According to Abington Police Report 23ABI-68-OF, on or about January 26, 2023, Abington Police received reports of catalytic converter thefts. Based upon review of the report, a total of ten vehicles were targeted and had their catalytic converters stolen. According to the report, Abington Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 12:30 AM on January 26, 2023. This vehicle appears to match the description of the MAROON ACURA MDX. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts. Of note, in surveillance video, one of suspects can be seen obtaining a blue jack from the MAROON ACURA MDX that they use to lift the targeted vehicle. A still image from surveillance video recovered by Abington Police follows:



247. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized cell towers in Weymouth, MA at 1:14 AM, 3:43 AM, 3:45 AM, 3:46 AM, 3:47 AM and 4:39 AM on January 26, 2023. These cell towers are within 1 mile from the locations of the thefts in Weymouth, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Weymouth, MA.
- b. TARGET PHONE 1 utilized cell towers in Abington, MA at 1:17 AM, 1:38 AM, and 3:12 AM on January 26, 2023. These cell towers are within 1.25 miles from the locations of the thefts in Abington, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Abington, MA.

248. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 10 utilized by Santo FELIBERTY relative to the incidents.

- a. TARGET PHONE 10 utilized cell towers in Weymouth, MA at 1:13 AM, 3:47 AM, 4:01 AM, 4:15 AM, 4:18 AM on January 26, 2023. These cell towers are within 1 mile from the locations of the thefts in Weymouth, MA. Network location data for TARGET PHONE 10 placed it in the immediate vicinity of the locations of the thefts in Weymouth, MA.
- b. TARGET PHONE 10 utilized cell towers in Abington, MA at 1:17 AM, 1:31 AM, 1:32 AM, 1:34 AM, 3:06 AM, 3:32 AM, and 3:34 AM on January 26, 2023. These cell towers are within 1.25 miles from the locations of the thefts in Abington, MA. Network location

data for TARGET PHONE 10 placed it in the immediate vicinity of the locations of the thefts in Abington, MA.

249. Investigators learned that the MAROON ACURA MDX stopped at the Framingham I-90 westbound service plaza at approximately 5:30 AM on January 26, 2023. Investigators obtained the surveillance video for the time that the MAROON ACURA MDX was at Framingham service plaza. At 5:30 AM, DAVILA entered the convenience store at that location. Still images from the surveillance video follow:



234. Investigators conducted remote surveillance of DAVILA's residence on January 27, 2023. Investigators observed DAVILA handling a blue jack consistent with the jack visible in the video recovered from Abington. Still images from that remote surveillance follow:



DAVILA handling blue jack. MAROON ACURA MDX in driveway of 799 S. West Street



Close-up of Blue Jack



Close-up of DAVILA

**SS. 1/31/23, Shrewsbury, MA**

235. According to Shrewsbury Police Reports 2023000003854, 2023000003855, 2023000003857, 2023000003862, 2023000003903, 2023000003883, 2023000003892, 2023000003894,

2023000003901, 2023000003925, 2023000003928, 2023000003929, 2023000003941, 2023000004032, 2023000004034, 2023000004532, 2023000004543, on or about January 30, 2023, Shrewsbury Police received reports of catalytic converter thefts. Based upon review of the reports, sixteen vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts. A still image taken of the MAROON ACURA MDX that evening follows:



236. Shrewsbury Police also received a report from a security guard in one of the location where some of the thefts took place. The security guard reported that at approximately 1:00 AM, he observed a maroon-colored SUV, possibly an Acura, near a Toyota Corolla that was lifted up by a jack. The suspects then observed the guard, quickly lowered the Corolla and sped off in the SUV.

237. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized cell towers in Shrewsbury, MA from 12:40 AM to 6:15 AM on January 31, 2023. The cell towers are within 2 miles from the locations of the thefts in Shrewsbury, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Shrewsbury, MA.

238. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 7 utilized by Zachary MARSHALL relative to the incidents.

- a. TARGET PHONE 7 utilized cell towers in Shrewsbury, MA from 12:40 AM to 5:52 AM on January 31, 2023. The cell towers are within 2 miles from the locations of the thefts in Shrewsbury, MA. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the locations of the thefts in Shrewsbury, MA.

239. Investigators learned that the MAROON ACURA MDX stopped at a Sunoco Gas Station in Springfield, MA at approximately 10:20 PM on January 30, 2023. Investigators obtained surveillance video from the gas station. In the video, DAVILA can be observed entering the convenience store, making a purchase, and then pumping gas into the MAROON ACURA MDX. Of note, DAVILA is wearing a black Adidas hat and black sneakers with silver piping. Still images from the surveillance video follow:



240. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and MARSHALL (utilizing TARGET PHONE 7) on January 30, 2023. Those text messages capture DAVILA and MARSHALL meeting up at the Basketball Hall of Fame around 10:36 PM before heading out to Shrewsbury, MA to commit the thefts.

Date/Time	Author	Content
1/30/2023 9:17:46 PM	DAVILA	I'm going to my crib to get everything together
1/30/2023 9:18:09 PM	MARSHALL	Ok just give me a call when you ready bro
1/30/2023 9:18:23 PM	DAVILA	Aight coo
1/30/2023 10:06:42 PM	DAVILA	I'm on the way to get gas. I'll be at the hall of fame in about 25 minutes
1/30/2023 10:33:17 PM	MARSHALL	I'm pulling up in there
1/30/2023 10:36:37 PM	DAVILA	I'm here

**TT. 2/9/23, Wilmington, MA and Woburn, MA**

241. According to Wilmington Police Report 23-161-OF, on or about February 9, 2023, Wilmington Police received a report of a catalytic converter theft. Based upon review of the report, one vehicle was targeted and had its catalytic converter stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in this theft.

242. According to Woburn Police Reports 23-211-OF, 23-212-OF, 23-213-OF, 23-214-OF, 23-215-OF, 23-216-OF, 23-220-OF, 23-221-OF, and 23-227-OF, on or about February 9, 2023, Woburn Police received reports of catalytic converter thefts. Based upon review of the reports, thirteen vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts. According to the reports, Woburn Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at 2:41 AM and 3:08 AM on February 9, 2023. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video recovered by Woburn Police follows:



243. Investigators learned that the MAROON ACURA MDX stopped at a Sunoco Gas Station in Springfield, MA at approximately 10:51 PM on February 8, 2023. Based on review of surveillance video, DAVILA arrived, entered the convenience store, made a purchase of two waters and another beverage, and

then pumped gas into the MAROON ACURA MDX. While pumping the gas, DAVILA put on a bright yellow glove to handle an item that he appears to discard. DAVILA entered the driver's seat of the MAROON ACURA MDX and departed the Sunoco at approximately 11:00 PM on February 8, 2023. Still images from the surveillance video follow:



244. Investigators obtained surveillance video from the Hilton Hotel located at the Basketball Hall of Fame in Springfield, MA. Review of the surveillance showed the following:

- a. At approximately 11:08 PM on February 8, 2023, the MAROON ACURA MDX arrived and parked in the parking lot. As it arrived, it parked near a gray Infiniti that was already parked in the parking lot. A male dressed in black exited the gray Infiniti and a male dressed in black exited the MAROON ACURA MDX. The male from the Infiniti then entered the passenger seat of the MAROON ACURA MDX and the driver of the MAROON ACURA MDX reentered the driver's seat. The MAROON ACURA MDX then departs at 11:12 PM on February 8, 2023. The gray Infiniti remains in the parking lot.
- b. At 6:09 AM on February 9, 2023, the MAROON ACURA MDX arrives and parks near the gray Infiniti. The passenger of the MAROON ACURA MDX exits and then enters the driver's seat of the gray Infiniti. The MAROON ACURA MDX and gray Infiniti then depart the parking lot at 6:11 AM on February 9, 2023.

245. Investigators travelled to the location where the gray Infiniti G37X bearing Texas Buyer Reg. 57432B2 with VIN: JN1CV6AR5AM454787 was parked. Investigators observed opened and empty Milwaukee packaging beside and behind where the Infiniti was parked in the public parking lot. These packages were from a Milwaukee rechargeable headlamp and a black fleece lined beanie, consistent with items utilized during the thefts. The discarded Milwaukee items were seized as evidence and analyzed for the presence of latent fingerprints. That analysis revealed that a fingerprint associated with MARSHALL was identified on the packaging.

246. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Springfield, MA at 11:12 PM on February 8, 2023, and at 6:11 AM on February 9, 2023. This cell tower is within 3000 feet of the Basketball Hall of Fame in Springfield, MA.
- b. TARGET PHONE 1 utilized a cell tower in Wilmington, MA at 1:14 AM, 1:16 AM, and 1:17 AM on February 9, 2023. This cell tower is within 1 mile from the location of the theft in Wilmington MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the location of the theft in Wilmington, MA.
- c. TARGET PHONE 1 utilized cell towers in Woburn, MA from 1:33 AM to 4:35 AM on February 9, 2023. The cell towers are within 2 miles from the locations of the thefts in Woburn, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Woburn, MA.

247. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 7 utilized by Zachary MARSHALL relative to the incidents.

- a. TARGET PHONE 7 utilized a cell tower in Springfield, MA at 11:12 PM on February 8, 2023, and at 6:12 AM on February 9, 2023. This cell tower is within 3000 feet of the Basketball Hall of Fame in Springfield, MA
- b. TARGET PHONE 7 utilized a cell tower in Wilmington, MA at 1:11 AM, 1:13 AM, 1:17 AM, 1:19 AM, 1:21 AM, 1:27 AM, 1:29 AM, and 1:42 AM on February 9, 2023. This cell tower is within 1 mile from the location of the theft in Wilmington, MA. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the location of the theft in Wilmington, MA.
- c. TARGET PHONE 7 utilized cell towers in Woburn, MA from 1:35 AM to 4:29 AM on February 9, 2023. The cell towers are within 2 miles from the locations of the thefts in Woburn, MA. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the locations of the thefts in Woburn, MA.

248. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and MARSHALL (utilizing TARGET PHONE 7) on February 8, 2023. Those text messages capture DAVILA and MARSHALL meeting up at the Basketball Hall of Fame around 11:00 PM before heading out to Wilmington, MA and Woburn, MA to commit the thefts.

Date/Time	Author	Content
2/8/2023 8:26:58 AM	MARSHALL	Send me the whole list of the codes so I can send to my man's in Florida just all the codes
2/8/2023 6:29:40 PM	MARSHALL	You was trying to go out today ?
2/8/2023 6:30:05 PM	DAVILA	I'll let you know in a few.
2/8/2023 6:30:18 PM	DAVILA	Ima make that list when I get home
2/8/2023 6:30:31 PM	MARSHALL	Ok bro I'm down to do what ever
2/8/2023 6:30:43 PM	DAVILA	Ok coo
2/8/2023 9:25:59 PM	DAVILA	I'm about to head to my crib. You tryna go out?
2/8/2023 9:26:55 PM	MARSHALL	Yea I'm down
2/8/2023 9:27:30 PM	DAVILA	Ok ima go home and get ready
2/8/2023 9:27:47 PM	MARSHALL	Ok
2/8/2023 10:36:31 PM	DAVILA	I'm ready wya
2/8/2023 10:36:50 PM	MARSHALL	I'm on state street
2/8/2023 10:36:58 PM	MARSHALL	At shorty crib waiting
2/8/2023 10:40:28 PM	DAVILA	Ok ima get gas now. Want to leave your car at your house of the hall of fame?
2/8/2023 10:40:47 PM	MARSHALL	I'm come back here she don't work so I can leave it out here
2/8/2023 10:45:31 PM	DAVILA	I'll be at the HOF in 15 min
2/8/2023 10:45:59 PM	MARSHALL	Ok bet leaving now

**UU. 2/16/23, Marlborough, MA, Northborough, MA**

249. According to Marlborough Police Report 23-1013-OF, on or about February 16, 2023, Marlborough Police received a report of a catalytic converter theft. Based upon review of the report, one vehicle was targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in this theft on February 9, 2023.

250. According to Northborough Police Reports 23000002199-00006298, 2300002202-00006319, 2300002204-00006320, and 2300002230-00007229, on or about February 16, 2023, Northborough Police received reports of catalytic converter thefts. Based upon review of the reports, four vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts. According to the report, Northborough Police recovered surveillance video in the area of the thefts and were able to identify a

vehicle involved in the thefts at approximately 5:00 AM on February 16, 2023. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video recovered by Northborough Police follows:



251. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Marlborough, MA from 2:18 AM to 2:30 AM on February 16, 2023. This cell tower is within 2000 feet from the location of the theft in Marlborough, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the location of the theft in Marlborough, MA.
- b. TARGET PHONE 1 utilized a cell tower in Northborough, MA from 4:48 AM to 5:12 AM on February 16, 2023. This cell tower is within 1.25 miles from the locations of the thefts in Northborough, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Northborough, MA.

252. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 7 utilized by Zachary MARSHALL relative to the incidents.

- a. TARGET PHONE 7 utilized a cell tower in Marlborough, MA from 1:51 AM to 2:20 AM on February 16, 2023. This cell tower is within 2000 feet from the location of the theft in Marlborough, MA. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the location of the theft in Marlborough, MA.
- b. TARGET PHONE 7 utilized a cell tower in Northborough, MA from 4:48 AM to 5:07 AM on February 16, 2023. This cell tower is within 1.25 miles from the locations of the thefts in Northborough, MA. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the locations of the thefts in Northborough, MA.

253. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and MARSHALL (utilizing TARGET PHONE 7) on February 8, 2023. Those text messages capture

DAVILA and MARSHALL meeting up at the Basketball Hall of Fame (“HOF” and “Hall”) around 10:50 PM before heading out to Marlborough, MA and Northborough, MA to commit the thefts.

Date/Time	Author	Content
2/15/2023 9:56:22 PM	DAVILA	I'm gettin ready
2/15/2023 9:58:38 PM	MARSHALL	Ok
2/15/2023 10:34:49 PM	DAVILA	Palmer or HOF?
2/15/2023 10:35:47 PM	MARSHALL	I'm at state street so y'all of fame
2/15/2023 10:35:52 PM	MARSHALL	Hall
2/15/2023 10:37:03 PM	DAVILA	Aight coo. Be there in 15
2/15/2023 10:37:10 PM	MARSHALL	Ok I'm leave here now
2/15/2023 10:37:15 PM	DAVILA	Ok

**VV. 2/28/23, Auburn, MA, Millbury, MA**

254. According to Millbury Police Reports 23-108-OF, on or about February 28, 2023, Millbury Police received a report of catalytic converter thefts. Based upon review of the report, seven vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts. Millbury Police recovered surveillance video in the area of the thefts depicting the suspects at approximately 11:58 PM on February 27, 2023.

255. According to Auburn Police Reports 23-236-OF, 23-243-OF, 23-275-OF, and 23-277-OF, on or about February 28, 2023, Auburn Police received reports of catalytic converter thefts. Based upon review of the reports, two vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts. According to the reports, Auburn Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 3:54 AM on February 28, 2023. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video recovered by Auburn Police follows:



256. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Millbury, MA from 11:52 PM on February 27, 2023, to 1:21 AM on February 28, 2023. The cell tower is located within 2000 feet from the location of the thefts in Millbury, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Millbury, MA.
- b. TARGET PHONE 1 utilized cell towers in Auburn, MA from 3:07 AM to 4:20 AM on February 28, 2023. The cell towers are located within 1 mile from the locations of the thefts in Auburn, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Auburn, MA.

257. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 7 utilized by Zachary MARSHALL relative to the incidents.

- a. TARGET PHONE 7 utilized a cell tower in Millbury, MA from 11:56 PM on February 27, 2023, to 1:21 AM on February 28, 2023. The cell tower is located within 2000 feet from the location of the thefts in Millbury, MA. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the locations of the thefts in Millbury, MA.
- b. TARGET PHONE 7 utilized cell towers in Auburn, MA from 3:06 AM to 4:20 AM on February 28, 2023. The cell towers were within 1 mile from the locations of the thefts in Auburn, MA. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the locations of the thefts in Auburn, MA.

**WW. 3/7/23, Hudson, MA, Burlington, MA, Wilmington, MA, Woburn, MA**

258. According to Hudson Police Report 23HUD-367, on or about March 7, 2023, Hudson Police received a report of a catalytic converter theft. Based upon review of the report, one vehicle was targeted and had its catalytic converter stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in this theft. According to the report, Hudson Police recovered surveillance video in the area of the theft and were able to identify a vehicle involved in the theft at approximately 12:55 AM on March 7, 2023. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video recovered by Hudson Police follows:



259. According to Wilmington Police Reports 23-263-OF, 23-264-OF, and 23-265-OF, on or about March 7, 2023, Wilmington Police received reports of catalytic converter thefts. Based upon review of the reports, three vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts. According to the reports, Wilmington Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 3:40 AM and 4:12 AM on March 7, 2023. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video recovered by Wilmington Police follows:



260. According to Woburn Police Report 23-370-OF, on or about March 7, 2023, Woburn Police received a report of catalytic converter thefts. Based upon review of the report, two vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts.

261. According to Burlington Police Reports 23-6741-OF and 23-6747-OF, on or about March 7, 2023, Burlington Police received report of catalytic converter thefts. Based upon review of the reports, four vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts. Burlington Police recovered surveillance video in the area of the thefts depicting the suspects at approximately 1:26 AM on March 7, 2023.

262. Additionally, Burlington Police noted that they engaged in a chase of the MAROON ACURA MDX at approximately 3:05 AM, reaching over 60 mph in a 30-mph zone. The MAROON ACURA MDX then got onto I-95 at which point the pursuit was discontinued. Burlington Police noted that the MAROON ACURA MDX “cut another vehicle off as it merged onto I-95 South at an extremely high rate of speed.” Investigators know from review of the historical GPS tracking data for the MAROON ACURA MDX that the vehicle reached 86 mph as it travelled on Middlesex Turnpike at 3:05 AM. Once the MAROON ACURA MDX entered onto I-95 southbound, it reached a speed of 116 mph at 3:07:21 AM.

263. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized cell towers in Wilmington, MA and Woburn, MA from 3:26 AM to 5:44 AM on March 7, 2023. The cell towers were within 1 mile from the locations of the thefts in Wilmington, MA and Woburn, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Wilmington, MA and Woburn, MA.

264. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 7 utilized by Zachary MARSHALL relative to the incidents.

- a. TARGET PHONE 7 utilized a cell tower in Hudson, MA at 12:30 AM on March 7, 2023. This cell tower is 500 feet from the location of the theft in Hudson, MA. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the location of the theft in Hudson, MA.
- b. TARGET PHONE 7 utilized a cell tower in Woburn, MA at 2:25 AM, 3:32 AM, 4:57 AM, 4:58 AM, and 5:25 AM on March 7, 2023. This cell tower is 2000 feet from the location of the theft in Woburn, MA. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the location of the theft in Woburn, MA. This cell tower is within 2 miles from the locations of the theft in Wilmington, MA.

265. Investigators obtained surveillance video from the Framingham westbound rest stop on I-90. Surveillance video depicts the MAROON ACURA MDX arriving, DAVILA and MARSHALL exiting the vehicle and entering the rest stop convenience store at approximately 6:13 AM on March 7, 2023. DAVILA and MARSHALL proceed through to the McDonald's at the rest stop, apparently make purchases, and then exited at approximately 6:30 AM on March 7, 2023. Still images of DAVILA and MARSHALL entering and exiting the Framingham rest area follow:



**XX. 3/9/23, Auburn, MA, Bedford, MA, Billerica, MA**

266. According to Auburn Police Reports 23-275-OF, and 23-277-OF, on or about March 9, 2023, Auburn Police received reports of catalytic converter thefts. Based upon review of the reports, three vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts. According to the reports, Auburn Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video recovered by Auburn Police follows:



267. According to Billerica Police Reports 2023-0503, and 2023-0533, on or about March 9, 2023, Billerica Police received reports of catalytic converter thefts. Based upon review of the reports, four vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts. According to the reports, Billerica Police recovered surveillance video in the area of the thefts and were able to identify a vehicle

involved in the thefts at approximately 1:42 AM and 3:11 AM on March 9, 2023. This vehicle appears to match the description of the MAROON ACURA MDX. Still images from surveillance video recovered by Billerica Police follow:



268. According to Bedford Police Reports 2023-2749, and 2023-2751, on or about March 9, 2023, Bedford Police received reports of catalytic converter thefts. Based upon review of the reports, two vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts. According to the reports, Bedford Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 3:39 AM on March 9, 2023. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from surveillance video recovered by Bedford Police follows:



269. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized cell towers in Auburn, MA at 1:37 AM, 4:10 AM, and 7:37 AM on March 9, 2023. The cell towers are within 2 miles from the locations of the thefts in Auburn, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Auburn, MA.
- b. TARGET PHONE 1 utilized cell towers in Bedford, MA and Billerica, MA from 1:39 AM to 3:50 AM on March 9, 2023. The cell towers are within 2 miles from the locations of the thefts in Billerica, MA and Bedford, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts in Billerica, MA and Bedford, MA.

270. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 7 utilized by Zachary MARSHALL relative to the incidents.

- a. TARGET PHONE 7 utilized a cell tower in Auburn, MA from 4:33 AM to 5:13 AM on March 9, 2023. This cell tower is within 3000 feet from the location of the theft in Auburn, MA. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the location of the theft in Auburn, MA.
- b. TARGET PHONE 7 utilized cell towers in Bedford, MA and Billerica, MA from 1:40 AM to 3:58 AM on March 9, 2023. The cell towers are within 2 miles from the locations of the thefts in Billerica, MA and Bedford, MA. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the locations of the thefts in Billerica, MA and Bedford, MA.

**YY. 3/16/23, Sterling, MA**

271. According to Sterling Police Reports 23-1865-OF, 23-1868-OF, on or about March 16, 2023, Sterling Police received reports of catalytic converter thefts. Based upon review of the reports, twenty vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts. According to the reports, Sterling Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 1:36 AM on March 16, 2023. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from the surveillance video recovered by Sterling Police follows:



272. Historical GPS tracking data for the MAROON ACURA MDX showed that it left DAVILA's residence at approximately 10:30 PM on March 15, 2023, and travelled to a residence associated with MARSHALL in Thorndike, MA. From there, the MAROON ACURA MDX travelled to Sterling, MA, and the location of the thefts into the morning of March 16, 2023. At approximately 2:49 AM on March 16, 2023, the MAROON ACURA MDX stopped briefly a residence associated with MARSHALL in Thorndike, MA, and then travelled back to DAVILA's residence.

**ZZ. 3/21/23, Leominster, MA, and Fitchburg, MA**

273. According to Leominster Police Reports 23-12441-OF, 23-12492-OF, 23-12493-OF, 23-12521-OF, 23-12547-OF, 23-12557-OF, 23-12562-OF, 23-12566-OF, 23-12876-OF on or about March 21, 2023, Leominster Police received reports of catalytic converter thefts. Based upon review of the reports, thirteen vehicles were targeted and had their catalytic converters stolen. Investigators know from historical GPS tracking data that the MAROON ACURA MDX was involved in these thefts. According to the reports, Leominster Police recovered surveillance video in the area of the thefts and were able to identify a vehicle involved in the thefts at approximately 12:05 AM on March 21, 2023. This vehicle appears to match the description of the MAROON ACURA MDX. A still image from the surveillance video recovered by Leominster Police follows:



## **VI. MONEY LAUNDERING CONSPIRACY: MONETIZATION OF STOLEN CATALYTIC CONVERTERS**

274. Since the precious metals within catalytic converters are not readily accessible, the thieves must engage in transactions with the stolen catalytic converters in order to monetize them. As noted above, TORRES has been identified as a large-scale buyer of stolen catalytic converters, who in turn transports the stolen catalytic converters to entities that extract the precious metals from the core of the catalytic converters. The core buyers that TORRES has been identified to have used thus far are all located outside of Massachusetts. As a result, in order to monetize the stolen catalytic converters, TORRES transports them across state lines into other states, such as Connecticut, or New Jersey – the states where the identified core buyers, Downpipe Depot, and DG Auto were located. TORRES would receive a set amount per catalytic converter and pay a lesser figure to the thieves such as DAVILA. Through this means, TORRES earns a profit serving as a middle-man and an ostensible legitimate cut-out for the core buyers, employing the shell company SCRAPGUYS413 LLC.

275. Once the stolen catalytic converters were delivered, TORRES would receive payment in cash, CashApp, electronic transfer, and wire transfer from the core buyers, and utilize the funds to pay the thieves. Consequently, the Defendants in this case agreed to conduct financial transactions, knowing that the property involved in the financial transactions represented the proceeds of interstate transportation of stolen property in violation of 18 U.S. C. § 2314.

**A. TORRES Text Messages with DAVILA**

276. In the course of this investigation, investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and TORRES (utilizing a phone number ending in 5858). In the text message conversation, DAVILA and TORRES discuss prices and timing of deliveries of catalytic converters that DAVILA will bring to TORRES. DAVILA also sends screen captures of lists: stating the number, make and model of converters that he drops off and the date and amount he is owed, in order to memorialize the transaction.<sup>15</sup> The dates and times of these drop offs, and related Notes are generally within a day or two of each evening where DAVILA engaged in catalytic converter thefts (described above). DAVILA also sends pictures of the catalytic converters to query prices and discuss their illicit business. Pertinent text messages between DAVILA (utilizing TARGET PHONE 1) and TORRES (utilizing TARGET PHONE 3) are contained in APPENDIX B to this affidavit.

**B. DAVILA Transactions with TORRES**

*1. March 7, 2023, Transfer*

277. Investigators know that Rafael DAVILA and MARSHALL conducted catalytic converter thefts throughout the Hudson, Burlington, Wilmington, and Woburn areas during the overnight hours of Tuesday, March 6, 2023, into Wednesday, March 7, 2023, utilizing the MAROON ACURA MDX. This sequence is described above. Upon completion of these thefts, historical GPS tracking data, corroborated by remote surveillance, confirmed that DAVILA and the MAROON ACURA MDX arrived back at his residence in Feeding Hills at 7:44 AM on March 7, 2023.

278. On March 7, 2022, at 2:10 PM, DAVILA and the MAROON ACURA MDX traveled to the area of 87 Oak Street in Springfield, arriving at 2:39 PM. Investigators observed the following:

- a. MAROON ACURA MDX backed up to a blue GMC Envoy parked in the driveway of 87 Oak Street, Springfield, MA. The GMC Envoy was parked with its rear cargo door open. DAVILA opened the rear cargo hatch door of the MAROON ACURA MDX, allowing for both vehicles to be directly facing one another, just a few feet away. Jose TORRES approached and stood next to DAVILA.

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<sup>15</sup> These lists are screen captures of “Notes” taken by DAVILA that he transmitted to TORRES.

- b. DAVILA loaded dozens of catalytic converters from the rear of the Acura MDX into the rear of the GMC Envoy. DAVILA then accessed the rear driver-side seat of the MAROON ACURA MDX and proceeded to load more catalytic converters into the rear cargo area of the GMC Envoy. In all, DAVILA loaded more than 40 catalytic converters from the MAROON ACURA MDX into the GMC Envoy.
- c. At 2:54 PM, DAVILA loaded the last of the catalytic converters into the GMC Envoy, then covered the catalytic converters with a black cloth so as to hide their presence in the rear of the vehicle. One minute later, R. DAVILA closed the rear cargo door of the GMC Envoy, at which point the registration of the GMC Envoy is observed to be Massachusetts 912MN5.
- d. Still images depicting DAVILA, TORRES, and the GMC Envoy loaded with catalytic converters follow:



*Catalytic Converters Loaded in Back of GMC Envoy*



R. DAVILA



TORRES

279. At 3:01 PM, a third individual unknown individual (UNSUB), spoke with DAVILA and TORRES. At 3:02 PM, DAVILA entered the driver's seat of the MAROON ACURA MDX and departed the area.

280. At 3:21 PM, UNSUB got into the GMC Envoy and drove away. The GMC Envoy is then believed to have travelled directly to Connecticut and into New York, based on the license plate reader information. Based upon this sequence, and other evidence gathered in this investigation, investigators believe that TORRES received the catalytic converters stolen by DAVILA and then arranged the transportation of the stolen catalytic converters to scrap dealers located in other states to sell them.

## 2. *March 16, 2023 Transfer*

281. Investigators are aware, based on physical and electronic surveillance, as well as catalytic converter thefts reported by various local police departments, that DAVILA and an as-yet unidentified second individual conducted catalytic converter thefts throughout the Hudson, Burlington, Wilmington, and Woburn areas during the overnight hours of Tuesday, March 15, 2023, into Wednesday, March 16, 2023, while utilizing the MAROON ACURA MDX. This sequence is described above.

282. On March 16, 2023, at 2:27 PM, a black Suburban being driven by DAVILA arrived at 87 Oak Street in Springfield, MA and backed into the driveway. No other vehicles are present. DAVILA exited the Suburban, opened the garage, and proceeded to unload catalytic converters into the garage. DAVILA finished unloading the Suburban, closed the garage door, and departed at 2:48 PM. Still images of DAVILA unloading catalytic converters from the Suburban follow:



283. On March 16, 2023, at 4:01 PM, a third party (“UNSUB”) arrived at 87 Oak in an Acura sedan and backs up to the garage. UNSUB opened the garage and proceeded to load dozens of catalytic converters into the trunk and rear of the Acura. TORRES, wearing a bright gold sweatshirt, then arrived and assisted UNSUB in loading the catalytic converters. Once they completed loading the Acura, TORRES then handed UNSUB an amount of cash and UNSUB drove away at 4:14 PM. Still images of TORRES and UNSUB loading the Acura follow.



### C. TORRES Transactions with Downpipe Depot & Recycling

284. According to agents of the Bureau of Alcohol, Tobacco and Firearm (ATF), Jose TORRES, a/k/a “Goldy” was a large-scale seller of catalytic converters to a Connecticut-based purchaser of catalytic converters known as Downpipe Depot & Recycling, LLC.<sup>16</sup> TORRES is believed to have sold a large quantity of stolen catalytic converters to Kolitsas in Connecticut from August 2021 to June 2022,<sup>17</sup> including hundreds of converters that TORRES received from DAVILA.

285. Investigators have reviewed the materials provided by ATF related to the Kolitsas case. Kolitsas operated Downpipe, which was an entity that would purchase stolen catalytic converters from individuals and then transport those converters to refiners located in New York. Investigators were provided with a lengthy text message conversation between Jose TORRES (utilizing the

<sup>16</sup> The owner of that entity, Alexander Kolitsas, Bryant Bermudez, and a number of other individuals have since been charged federally in the District of Connecticut with interstate transportation of stolen property and money laundering offenses related to stolen catalytic converters. See United States v. Kolitsas, et. al., Docket No. 22-cr-00171-SVN (D. Conn).

<sup>17</sup> On June 1, 2022, a search warrant was executed at the premises of Downpipe Depot, which is believed to have caused their operations to cease.

“Goldy.Torres.357” Facebook account) and Alexander Kolitsas taking place over Facebook. These Facebook messages between TORRES and Kolitsas commence on August 2, 2021, and continue through May 26, 2022, and were contained in the data and information obtained by ATF investigators pursuant to a search warrant issued by the District of Connecticut to Facebook.

286. Over the course of hundreds of Facebook messages, TORRES and Kolitsas discuss prices, coordinate payments, and arrange deliveries of hundreds of catalytic converters to locations in Connecticut specified by Kolitsas. From the content of the messages, investigators believe that TORRES was purchasing stolen catalytic converters from multiple individuals in the Springfield area (including DAVILA) and then bringing large groups of stolen converters to Kolitsas in Connecticut for resale. An example of the conversation between TORRES (utilizing the Goldy.Torres.357 Account, Facebook ID “100028898328985”) and Kolitsas (using the Facebook ID “100069416026625”) follows:

Date	Author Facebook ID	Content
08/02/2021	100028898328985 (Torres)	Good morning u buy cats in the ct area?
08/02/2021	100069416026625 (Kolitsas)	Yes I do! I buy lots
08/02/2021	100069416026625 (Kolitsas)	I buy quite a bit of pieces in CT. What do you have? I don't see anyone local paying better
08/02/2021	100028898328985 (Torres)	Goldy sent a photo.
08/02/2021	100069416026625 (Kolitsas)	Double shield. \$1200
08/02/2021	100028898328985 (Torres)	I got a few pieces I only get like 20 /30 a week I buy a lot of junk cars small business llc
08/02/2021	100069416026625 (Kolitsas)	That's what's up. I have an LLC as well. I'll buy whatever pieces you have, any questions or price quotes you need just send them my way.
08/02/2021	100028898328985 (Torres)	I 3 of those right now a ral 3 biscuit and no number 3 biscuit
08/02/2021	100069416026625 (Kolitsas)	I work with lots of people who junk cars. I pay well and always respond.
08/02/2021	100069416026625 (Kolitsas)	YC2C?
08/02/2021	100028898328985 (Torres)	Got a ea6 stick how much
08/02/2021	100069416026625 (Kolitsas)	Which RAL?
08/02/2021	100069416026625 (Kolitsas)	Haven't clean it good yet I just noticed the ral I'll check in a bit
08/02/2021	100069416026625 (Kolitsas)	1200 / 1200 / 1200 / 1020-1270 depending which RAL / 360 No code 3 biscuit / 1520 for Gd3/Ea6 set
08/02/2021	100028898328985 (Torres)	I can meet u today bring u a few
08/02/2021	100028898328985 (Torres)	The no number 3 biscuit I get 650
08/02/2021	100069416026625 (Kolitsas)	Have a picture of it?
08/02/2021	100069416026625 (Kolitsas)	Double or single shield?
08/02/2021	100028898328985 (Torres)	I'll send u picture in a few
08/02/2021	100028898328985 (Torres)	Can u meet or u got a spot to bring them?
08/02/2021	100069416026625 (Kolitsas)	Sounds good man. The double shield 3 biscuit I can do 650. I usually meet people at my dad's restaurant just because it's in a nice small town right off the highway and always safe
08/02/2021	100028898328985 (Torres)	We're at
08/02/2021	100069416026625 (Kolitsas)	Maples Restaurant / 725 Straits Turnpike / Middlebury, CT / 06762
08/02/2021	100069416026625 (Kolitsas)	My day is pretty open as of right now, so let me know what time you're thinking and obviously I will work around you
08/02/2021	100028898328985 (Torres)	Iam not to far 45 min away Gps says I can meet there at 1
08/02/2021	100069416026625 (Kolitsas)	Let's do it. Sounds good.

08/02/2021	100028898328985 (Torres)	Iam bring like 15 pieces different things
08/02/2021	100069416026625 (Kolitsas)	Sounds good bro. I'll show you how I work. I think you'll enjoy selling to me
08/02/2021	100069416026625 (Kolitsas)	About as easy, no bullshit and responsive as people get
08/02/2021	100028898328985 (Torres)	Cool I'll bring u alot of business to see u then
08/02/2021	100069416026625 (Kolitsas)	Sound good

287. The above conversation is the beginning of the text messages between TORRES and Kolitsas. In this exchange, TORRES and Kolitsas discuss the sale of catalytic converters that they refer to as “pieces.” TORRES informs Kolitsas he receives 20/30 converters a week. TORRES then asks how much Kolitsas is paying for a particular converter (an “ea6 stick”) and after receiving prices, TORRES says he will bring a few that day. TORRES then states he will be bringing a lot of business to Kolitsas.

288. Another exchange between TORRES and Kolitsas that took place over Facebook on December 29, 2021, into December 30, 2021, follows:

Date	Author Facebook ID	Content
12/29/2021	100028898328985 (Torres)	[PHONE NUMBER ENDING IN 8233]
12/29/2021	100028898328985 (Torres)	Zell to that number it's my mom's [MO]
12/29/2021	100069416026625 (Kolitsas)	Nah for real though. Do what you gotta do bro. I'll pay app price and round up on everything
12/29/2021	100069416026625 (Kolitsas)	Like I've been doing
12/29/2021	100028898328985 (Torres)	??
12/29/2021	100069416026625 (Kolitsas)	When are they coming?
12/29/2021	100069416026625 (Kolitsas)	And who is it
12/29/2021	100028898328985 (Torres)	Cuz [D]
12/29/2021	100028898328985 (Torres)	Should be getting there
12/29/2021	100069416026625 (Kolitsas)	Tell him to pull up next to my truck
12/29/2021	100069416026625 (Kolitsas)	Ask him how far
12/29/2021	100028898328985 (Torres)	10 min he said he can't see
12/29/2021	100069416026625 (Kolitsas)	Lol
12/29/2021	100028898328985 (Torres)	It's mad cloudy or something lol
12/29/2021	100069416026625 (Kolitsas)	Mad foggy
12/29/2021	100028898328985 (Torres)	Yea that lol
12/29/2021	100069416026625 (Kolitsas)	I rounded each code up. One of the pills were completely hollow, I showed your cousin. \$7400 exactly
12/29/2021	100069416026625 (Kolitsas)	You sent a photo.
12/29/2021	100069416026625 (Kolitsas)	About 1-2% higher than yesterday's prices
12/29/2021	100069416026625 (Kolitsas)	Idk if I can send all that but I'll try
12/29/2021	100028898328985 (Torres)	??
12/29/2021	100069416026625 (Kolitsas)	I'll send 3600 now and then rest in a couple hours because I'm sure I'll be awake after midnight
12/30/2021	100069416026625 (Kolitsas)	I'll send 3400 and he'll send the rest
12/30/2021	100069416026625 (Kolitsas)	I'll figure it out
12/30/2021	100028898328985 (Torres)	??
12/30/2021	100069416026625 (Kolitsas)	I owe you 3k still. His Zelle limit is 1k. Can I try with Venmo or PayPal? I'll have cash in the next few hours too
12/30/2021	100028898328985 (Torres)	It's fine bro don't stress it
12/30/2021	100069416026625 (Kolitsas)	I just don't like owing anyone anything.
12/30/2021	100028898328985 (Torres)	How bout cash app
12/30/2021	100069416026625 (Kolitsas)	Cashapp is maxed out lol
12/30/2021	100069416026625 (Kolitsas)	End of the month gets rough with sending
12/30/2021	100028898328985 (Torres)	Lol I might be goin home later

289. In this exchange, TORRES instructs Kolitsas to send him money for recently sold catalytic converters to TORRES' mother via the cash transfer application Zelle ("Zell to that number it's my mom's"). TORRES informs Kolitsas that his cousin ("Darwin") will be delivering the converters and they coordinate the timing of his arrival. Kolitsas then informs TORRES that he rounded up the prices for the converters and that one of the converters did not have any cores ("One of the pills were completely hollow"). Kolitsas states that he will pay TORRES \$7,400 for the converters and coordinates the amounts that he will be sending via cash transfer applications.

290. Another exemplary exchange between TORRES and Kolitsas that took place over Facebook on March 27, 2022, follows:

Date	Author	Author Facebook ID
03/27/2022	100028898328985 (Torres)	Yo yo yo
03/27/2022	100069416026625 (Kolitsas)	What's up
03/27/2022	100028898328985 (Torres)	Got like 50 piece for u
03/27/2022	100028898328985 (Torres)	Tomorrow
03/27/2022	100069416026625 (Kolitsas)	Yes sir
03/27/2022	100069416026625 (Kolitsas)	Drop off Tuesday so perfect
03/27/2022	100028898328985 (Torres)	Want grab 3 3lm sticks my boy got I ain't grab em I rand out cash
03/27/2022	100028898328985 (Torres)	You missed a call from Goldy.
03/27/2022	100069416026625 (Kolitsas)	I'm gonna be busy the rest of the night
03/27/2022	100028898328985 (Torres)	Cash app me I'll bring em down
03/27/2022	100069416026625 (Kolitsas)	Don't bring them till tomorrow
03/27/2022	100028898328985 (Torres)	Yea I know lol
03/27/2022	100069416026625 (Kolitsas)	How much
03/27/2022	100028898328985 (Torres)	3
03/27/2022	100069416026625 (Kolitsas)	\$300
03/27/2022	100028898328985 (Torres)	Lol
03/27/2022	100028898328985 (Torres)	3000 it's 3 of them
03/27/2022	100069416026625 (Kolitsas)	I'm at like 960 each on them for you
03/27/2022	100069416026625 (Kolitsas)	Just so you know
03/27/2022	100028898328985 (Torres)	Danmmm lol
03/27/2022	100069416026625 (Kolitsas)	Tell dude to fuck off
03/27/2022	100028898328985 (Torres)	2880
03/27/2022	100028898328985 (Torres)	Can't he just bring me 40 pieces lol
03/27/2022	100028898328985 (Torres)	I give him 800 a stick usually
03/27/2022	100069416026625 (Kolitsas)	I pay 850 usually
03/27/2022	100069416026625 (Kolitsas)	I'll send 3000 I'm just saying that right now I'm at 960
03/27/2022	100069416026625 (Kolitsas)	Id cashapp let's me
03/27/2022	100028898328985 (Torres)	K
03/27/2022	100028898328985 (Torres)	Hopefully the market goes up in the morning lol
03/27/2022	100069416026625 (Kolitsas)	I really hope so
03/27/2022	100069416026625 (Kolitsas)	Seems to have gone everyday for 3 weeks straight
03/27/2022	100069416026625 (Kolitsas)	Down* everyday
03/27/2022	100028898328985 (Torres)	I got 37 zuzu lol
03/27/2022	100069416026625 (Kolitsas)	Solid

291. In this exchange, TORRES informs Kolitsas that he has 50 converters to bring down ("Got like 50 pieces for u" "Tomorrow"). TORRES then asks Kolitsas if he wants to buy three expensive

converters (“3lm sticks”) that his customer has, but that TORRES was unable to buy them because he ran out of cash (“Want grab 3 3lm sticks my boy got I ain’t grab em I rand out cash”). TORRES asks Kolitsas to send TORRES money via Cashapp so he can buy the expensive converters (“Cash app me I’ll bring em down”). Kolitsas instructs TORRES to not bring the expensive converters until the next day, and then confirms the price of \$960 for the “3lm stick”. They then discuss how much to pay TORRES’ customer, and Kolitsas indicates he will send TORRES \$3,000 via Cashapp for the three expensive converters. TORRES then informs Kolitsas that he also has 37 Isuzu converters (“I got 37 zuzu lol”).

292. Additionally, investigators learned that Downpipe Depot and Recycling (“Downpipe”) employed a point-of-sale system that was recovered during their investigation. ATF investigators provided the associated records for payments made by Kolitsas to those from whom he was purchasing catalytic converters. According to the ATF investigators associated with the case, this point-of-sale system at Downpipe was believed to have been utilized from January 2022 through June 1, 2022, when the ATF investigation concluded with the execution of search warrants. The documents related to the point-of-sale system listed an index of all payments issued by Downpipe Depot and Recycling by recipient. Among the entities who received payments was an entity named “SCRAPGUYS413LLC”, which investigators know to be an entity formed by TORRES. The internal account information for Downpipe identified the SCRAPGUYS413LLC account as being associated with a “Jose” “Torres.” Investigators have reviewed the call detail records for Jose TORRES’ phone number ending in 5858 and observed historical calls to phone numbers known to have been used by Kolitsas.

293. According to the payment ledger, SCRAPGUYS413LLC was paid approximately \$338,380 by Kolitsas during the period of January 2022 through May 2022 for catalytic converters that investigators believe to have been stolen by DAVILA and other coconspirators. The following is the ledger of payments that were issued to SCRAPGUYS413LLC by TORRES:

Payment Date	Company Name	Invoice Number	Invoice Date	Total \$
5/20/2022	SCRAPGUYS413LLC	I220520924	5/20/2022	17560
5/2/2022	SCRAPGUYS413LLC	I220502817	5/2/2022	8700
4/15/2022	SCRAPGUYS413LLC	I220415744	4/15/2022	17800
4/5/2022	SCRAPGUYS413LLC	I220405683	4/5/2022	7550

4/1/2022	SCRAPGUYS413LLC	I220401653	4/1/2022	11000
3/28/2022	SCRAPGUYS413LLC	I220328612	3/28/2022	19300
3/27/2022	SCRAPGUYS413LLC	I220327606	3/27/2022	3000
3/25/2022	SCRAPGUYS413LLC	I220325585	3/25/2022	8150
3/16/2022	SCRAPGUYS413LLC	I220316522	3/16/2022	9700
3/15/2022	SCRAPGUYS413LLC	I220315513	3/15/2022	9780
3/14/2022	SCRAPGUYS413LLC	I220314498	3/14/2022	15700
3/10/2022	SCRAPGUYS413LLC	I220311474	3/10/2022	7040
3/9/2022	SCRAPGUYS413LLC	I220309456	3/9/2022	14250
3/7/2022	SCRAPGUYS413LLC	I220307440	3/7/2022	12580
3/4/2022	SCRAPGUYS413LLC	I220304417	3/4/2022	10005
3/2/2022	SCRAPGUYS413LLC	I220302406	3/2/2022	7280
2/27/2022	SCRAPGUYS413LLC	I220227374	2/27/2022	6100
2/21/2022	SCRAPGUYS413LLC	I220221319	2/21/2022	700
2/21/2022	SCRAPGUYS413LLC	I220221321	2/21/2022	11705
2/19/2022	SCRAPGUYS413LLC	I220219303	2/19/2022	9110
2/15/2022	SCRAPGUYS413LLC	I220215266	2/15/2022	17530
2/10/2022	SCRAPGUYS413LLC	I220210243	2/10/2022	14000
2/7/2022	SCRAPGUYS413LLC	I220208219	2/7/2022	41700
2/6/2022	SCRAPGUYS413LLC	I220206211	2/6/2022	5000
2/5/2022	SCRAPGUYS413LLC	I220206212	2/5/2022	3500
2/3/2022	SCRAPGUYS413LLC	I220128130	1/28/2022	5000
2/3/2022	SCRAPGUYS413LLC	I220203183	2/3/2022	8100
2/1/2022	SCRAPGUYS413LLC	I220201164	2/1/2022	14150
1/31/2022	SCRAPGUYS413LLC	I220201159	1/31/2022	10070
1/28/2022	SCRAPGUYS413LLC	I220128135	1/28/2022	12320
			<b>TOTAL</b>	<b>\$338,380</b>

294. During their investigation, ATF was able to seize CCTV camera footage from Downpipe Depot's primary location in Connecticut. Downpipe Depot had several cameras installed in and around the building where the catalytic convertors were being delivered. One of the cameras was positioned directly over the main entrance to the garage where the catalytic convertors were offloaded.

295. On March 14, 2022, TORRES, Kolitsas and Bryant Bermudez, a/k/a Bryant Li (an employee of Downpipe Depot who was also indicted) had a conversation over Facebook messenger that follows:

Date	Author Facebook ID	Content
3/14/2022	(Goldy Torres) 100028898328985	Ya at the spot
3/14/2022	(Alex Kolitsas) 100069416026625	Bryant is. I'm in Long Island about to unload
3/14/2022	(Goldy Torres) 100028898328985	I am send my cuz up
3/14/2022	(Bryant Li) 100012161740609	Yessir bro
3/14/2022	(Bryant Li) 100012161740609	What time
3/14/2022	(Goldy Torres) 100028898328985	In like n hour
3/14/2022	(Bryant Li) 100012161740609	Okay

3/14/2022	(Bryant Li) 100012161740609	Cool
3/14/2022	(Goldy Torres) 100028898328985	On the way
3/14/2022	(Goldy Torres) 100028898328985	He Pulling up

296. On March 14, 2022, at 1:09 PM (time shown on camera), a black, 4 door, Toyota Tacoma with Massachusetts tag 1HGW68 pulls into the garage. A male driver wearing a San Francisco 49ers winter hat gets out and walks to the back of the truck. The two workers open the tail gate and tunnel cover. The back of the Tacoma is full of catalytic convertors. They unloaded 27 convertors. There is a Downpipe invoice for \$9,700 to SCRAPGUYS413 LLC that appears to match this transaction. Still images from the Downpipe surveillance system follow:



297. On March 16, 2022, TORRES and Kolitsas had a conversation over Facebook messenger that follows:

Date	Author Facebook ID	Content
3/16/2022	(Goldy Torres) 100028898328985	Bout to go up
3/16/2022	(Alex Kolitsas) 100069416026625	Word
3/16/2022	(Goldy Torres) 100028898328985	Hereeeeeee

298. On March 16, 2022, at 1:08 PM (time shown on camera), a silver Hyundai with Massachusetts tag number 1CFB67 pulls into the garage. TORRES gets out of the passenger seat, they open the trunk and start unloading catalytic convertors. There are 17 catalytic convertors unloaded from the vehicle. There is a Downpipe invoice for \$9,700 to SCRAPGUYS413 LLC that appears to match this

transaction. They leave the garage at 1:52 PM. A still image from the Downpipe surveillance system follows:



299. On April 1, 2022, TORRES and Kolitsas had a conversation over Facebook messenger that follows:

Date	Author Facebook ID	Content
04/01/2022	(Goldy Torres) 100028898328985	Yo Yo
04/01/2022	(Alex Kolitsas) 100069416026625	Yo
04/01/2022	(Alex Kolitsas) 100069416026625	How much you have
04/01/2022	(Goldy Torres) 100028898328985	Like 20 pieces
04/01/2022	(Goldy Torres) 100028898328985	I'll be there in like n hour

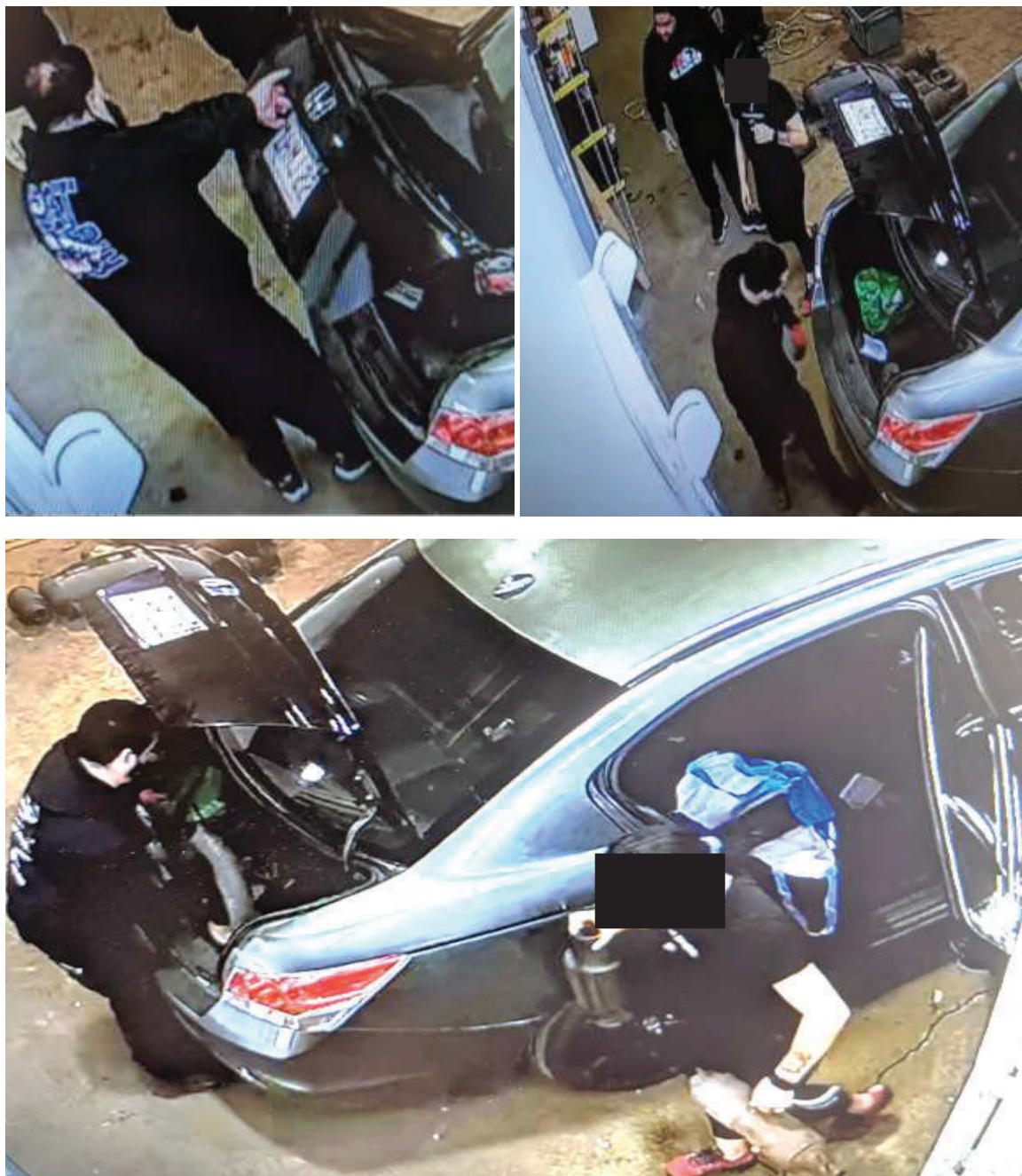
300. On April 1, 2022, at 1:18 PM (time shown on camera), a white UHaul rental van pulled into the garage. TORRES gets out of the passenger side and a woman identified as TORRES's girlfriend gets out of the driver side door. TORRES is wearing the same camouflage backpack across his chest that he wore last trip. The van is pulled in front first, so a worker gets in the van and turns the van around so the van can be unloaded from the back. They unload approximately 20 catalytic convertors. There is a Downpipe invoice for \$9,700 to SCRAPGUYS413 LLC that appears to match this transaction. Still images from the Downpipe surveillance system follow:



301. On April 5, 2022, TORRES and Bermudez had a conversation over Facebook messenger that follows:

Date	Author Facebook ID	Content
04/05/2022	Goldy Torres 100028898328985	What's good you at the spot
04/05/2022	Bryant Li 100012161740609	Ya at the spot
04/05/2022	Goldy Torres 100028898328985	I'm on my way there bro
04/05/2022	Goldy Torres 100028898328985	10 min out bro

302. On April 5, 2022, at 12:50 PM (time shown on camera), a Honda bearing Massachusetts tag 1HMJ22, drove into the garage. TORRES gets out of the passenger side door. TORRES' girlfriend gets out of the driver side door. TORRES immediate went to the trunk and opened it, there were several catalytic convertors in the trunk. TORRES' girlfriends helps unload the convertors and they unload 19 convertors in total. There is a Downpipe invoice for \$9,700 to SCRAPGUYS413 LLC that appears to match this transaction. TORRES is paid in cash and leaves at 1:17 PM. Still images from the Downpipe surveillance system follow:



303. On April 15, 2022, TORRES and Bermudez had a conversation over Facebook messenger that follows:

Date	Author Facebook ID	Content
04/15/2022	Goldy Torres 100028898328985	Ya goin to be there tomorrow to go up
04/15/2022	Bryant Li 100012161740609	Yessir bro around noon
04/15/2022	Bryant Li 100012161740609	You coming for 12?
04/15/2022	Goldy Torres 100028898328985	Yea
04/15/2022	Bryant Li 100012161740609	Ok cool

04/15/2022	Goldy Torres 100028898328985	Omw
04/15/2022	Bryant Li 100012161740609	Okay bro

304. On April 15, 2022, at 11:33 AM (time shown on camera), a Honda bearing Massachusetts tag 1HMJ22, drove into the garage. TORRES gets out of the passenger side door wearing an orange shirt with the camouflage backpack across his chest as seen in previous drop offs. TORRES' girlfriend starts unloading the catalytic convertors and they unload approximately 25 convertors There is a Downpipe invoice for \$17,800 to SCRAPGUYS413 LLC that appears to match this transaction. TORRES is given cash and they leave the garage in the Honda at 12:40 PM.



305. On May 2, 2022, TORRES and Bermudez had a conversation over Facebook messenger that follows:

Date	Author Facebook ID	Content
05/02/2022	Goldy Torres 100028898328985	Yo yo
05/02/2022	Bryant Li 100012161740609	Yo yo
05/02/2022	Goldy Torres 100028898328985	U up there to go tru in a few
05/02/2022	Bryant Li 100012161740609	yeah can you be here by 1230?
05/02/2022	Goldy Torres 100028898328985	Yea
05/02/2022	Bryant Li 100012161740609	Okay cool see you at 12:30
05/02/2022	Goldy Torres 100028898328985	Pulling up
05/02/2022	Bryant Li 100012161740609	ok

306. On May 2, 2022, at 11:35 AM (time shown on camera), a Honda bearing Massachusetts tag 1HMJ22, drove into the garage. TORRES gets out of the passenger side door wearing black sweatshirt

and black sweatpants with the camouflaged backpack seen in the previous videos across his chest. TORRES opens the trunk and there are several catalytic convertors in the trunk. They unload 21 convertors from the Honda's trunk. There is a Downpipe invoice for \$8,700 to SCRAPGUYS413 LLC that appears to match this transaction. TORRES gets paid in cash and gets back into the Honda and they depart.



#### **D. TORRES Text Messages with DG Auto employee Ishu Lakra**

307. Investigators reviewed text messages between TORRES (utilizing a phone ending in 5858) and an individual named Ishu Lakra (using phone numbers ending in 9052 and 2207), who is a former employee of DG Auto. Lakra was himself indicted on November 1, 2022, for conspiracy to transport stolen property interstate. *See U.S. v. Khanna, et. al.*, Docket No. 22-CR-0213-KJM (E.D.Cal. Oct. 20, 2022).

308. The first set of messages between TORRES and Lakra (utilizing the 9052 number) took place between April 2022 and August 2022 and are attached as APPENDIX C to this affidavit. TORRES had the contact for the 9052 number listed as “Dg Cat”. Among those messages, TORRES and Lakra discuss the deliver of hundreds of thousands of dollars worth of catalytic converters to DG Auto’s facility in New Jersey. According to TORRES, the values of the loads of catalytic converters that he was bringing down were upwards of \$30,000, \$40,000, and \$50,000 per week.<sup>18</sup> Lakra commented to TORRES at one

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<sup>18</sup> It was critical for TORRES to alert Lakra as to the value so that DG Auto would have sufficient cash to conduct the transaction.

point about his volume of transactions: “From last couple of weeks you’re only doing 30-35 k a week”, “You reached 85k a week once.”

309. Lakra was arrested in New Jersey in relation to the E.D. California Indictment on November 2, 2022, and appeared before a magistrate that day. See U.S. v. Lakra, Docket No. 22-mj-12375-JBC (D. NJ Nov. 2, 2022). Lakra was released on a \$200,000 unsecured bond with conditions that he “not violate any federal, state or local law while on release” and “not engage in the business of buying, selling, transporting, or processing catalytic converters, including whole catalytic converters, catalytic cores, catalytic bricks or precious metal powders extracted from catalytic converters.” See ECF #32, U.S. v. Lakra, Docket No. 22-mj-12375-JBC (E.D. Cal.).

310. Following his release, on December 8, 2022, Lakra made contact with TORRES via text message utilizing a new phone number ending in 2297. This contact was saved by TORRES as “Ishu New.” During the conversation, TORRES and Lakra continue to discuss the sale of stolen catalytic converters. Of note, during one exchange concerning Lakra changing of the date for a delivery, TORRES accuses Lakra of working with federal law enforcement (“what’s the issue u working with the feds or something”). The text messages between TORRES and Lakra follow:

Date / Time	Author	Body
12/8/2022 10:03:50 PM	Lakra	Yo what’s up
12/20/2022 1:44:47 PM	TORRES	
12/20/2022 1:58:13 PM	Lakra	This will be all regular domestic stuff bro
12/20/2022 1:58:52 PM	Lakra	Its Gm cats
12/20/2022 2:00:17 PM	Lakra	I’ll call you around evening time

12/20/2022 4:34:19 PM	TORRES	The ones that use to say natural gas
12/20/2022 4:34:40 PM	TORRES	Looks like 4846 but a lil smaller
12/20/2022 4:34:47 PM	Lakra	Ohh those big ones
12/20/2022 4:35:33 PM	Lakra	Those comes put of isuzu They're like 5 pounds They'll go in same 4846 bag
12/20/2022 5:59:17 PM	TORRES	
12/20/2022 5:59:17 PM	TORRES	How bout tundra stick
12/20/2022 6:02:18 PM	Lakra	The back piece x97 and all are bad The front is good which will be like tm2 or th4
12/20/2022 6:02:48 PM	TORRES	Tm2
12/20/2022 6:03:01 PM	Lakra	Tm2 Is good
12/20/2022 6:03:14 PM	TORRES	Goes in the good pile
12/20/2022 6:03:43 PM	Lakra	Yes tm2 in good
12/20/2022 6:09:36 PM	Lakra	
12/20/2022 6:09:44 PM	Lakra	This is what he. Square will look like

12/20/2022 6:36:16 PM	TORRES	
12/20/2022 6:55:29 PM	Lakra	👍
12/20/2022 8:53:17 PM	TORRES	What's the address he goin
12/20/2022 8:57:46 PM	Lakra	435 Elizabeth Ave, Somerset, NJ 08873
12/20/2022 8:58:06 PM	Lakra	Come around 4-5
12/20/2022 8:58:20 PM	Lakra	Not too early
12/20/2022 8:59:00 PM	TORRES	Y not early now
12/20/2022 8:59:17 PM	TORRES	I been told him to get up early
12/20/2022 9:12:58 PM	Lakra	Bro if can only send him in the morning then send him Thursday morning
12/20/2022 9:13:06 PM	Lakra	I can't do tomorrow morning
12/20/2022 9:13:19 PM	Lakra	Tomorrow needs to be afternoon time i am sorry bro
12/20/2022 9:15:43 PM	TORRES	Smh
12/20/2022 9:16:12 PM	TORRES	5
12/20/2022 9:20:25 PM	Lakra	Ok
12/21/2022 10:52:17 AM	Lakra	Yo ?
12/21/2022 10:55:30 AM	TORRES	What's good
12/21/2022 10:59:15 AM	Lakra	What time is he coming Bro tbh I would prefer if he comes tomorrow morning
12/21/2022 10:59:43 AM	TORRES	5
12/21/2022 11:00:01 AM	TORRES	Y tomorrow morning now smh
12/21/2022 11:04:56 AM	TORRES	Now u just scare me u keep changing time day what's the issue u working with the feds or something
12/21/2022 11:05:56 AM	Lakra	Tomorrow is just better for me Because i didn't got my wire transfer yesterday So little short on money
12/21/2022 11:06:47 AM	Lakra	Bro i am telling you the true answer And if you really think like this feds or something you don't have to come bro
12/21/2022 11:07:02 AM	Lakra	Like i am honestly telling you and you're saying all this to me
12/21/2022 11:07:03 AM	TORRES	Lol
12/21/2022 11:07:21 AM	TORRES	U can't grab the 100 at least
12/21/2022 11:07:34 AM	Lakra	You just told me yesterday that you're planning on coming Wednesday So i also need some time
12/21/2022 11:16:03 AM	TORRES	So what we doin
12/21/2022 11:16:32 AM	TORRES	I got everything ready to go already in the car n everything
12/21/2022 11:17:05 AM	Lakra	Send him tomorrow if you can bro please Too much stress and problem today for me
12/21/2022 11:17:11 AM	Lakra	Please i am sorry
12/21/2022 12:03:03 PM	Lakra	Is that okay?
12/21/2022 12:03:10 PM	Lakra	Bro

12/21/2022 12:09:17 PM	Lakra	Lmk ?
12/21/2022 2:06:44 PM	TORRES	Early tomorrow?
12/21/2022 4:23:29 PM	Lakra	No bro plan cancelled the refinery called me they're closed till Sunday for Christmas It have to be on 26 the Monday
12/21/2022 4:23:55 PM	Lakra	I can't take it even tomorrow because I won't be able to sell it and I don't wanna just keep it
12/21/2022 4:24:36 PM	Lakra	I know you must be thinking i am giving you excuses But this is the truth bro Because of Christmas they're closed, you can check on google too
12/21/2022 4:26:43 PM	TORRES	Wow what a waste of time and cats ruined I could of just sold the cats 
12/21/2022 4:28:09 PM	Lakra	I understand where you coming from bro But i am already very stressed And its not waste of time
12/21/2022 4:28:23 PM	Lakra	I'll give you \$5more on each pound
12/21/2022 4:28:34 PM	Lakra	For the wait if that makes you happy
12/21/2022 4:28:57 PM	Lakra	That will be another \$1k for you
12/21/2022 4:29:00 PM	TORRES	Yea it is cuz now lam stuck hector really need it to make some money he ain't bought shit for Christmas
12/21/2022 4:29:37 PM	TORRES	Now we both stuck no cash till Wend ever we sell that broken stuff
12/21/2022 4:30:48 PM	Lakra	Bro i have been talking to you about this for last 3 weeks but if you wanna sell this particular week when they're closed for a big holiday Then you tell me what do i do
12/21/2022 4:31:39 PM	TORRES	Buy it n hold it till Monday
12/21/2022 4:32:13 PM	TORRES	But w.e I guess lam stuck another week
12/21/2022 4:32:26 PM	Lakra	I can't keep that stuff in my house bro you know i have a case going onn
12/21/2022 4:33:16 PM	TORRES	It's powder and not stolen but yea lmk then
12/21/2022 4:34:28 PM	Lakra	I can't take anything in my house bro this you have to understand I have a big case I can't spoil that
12/21/2022 4:34:39 PM	Lakra	If you want i can give you some advance
12/21/2022 4:34:45 PM	Lakra	Like 1-2k
12/21/2022 4:35:10 PM	Lakra	So that you can pay hector
12/21/2022 4:36:23 PM	TORRES	I know it's w.e yea if u want so I can pay him ahead he doesn't got no money and I already been taking loses for 2 months haven't made a dollar
12/21/2022 4:37:11 PM	Lakra	How much do you pay him for a trip ?
12/21/2022 4:37:25 PM	Lakra	I haven't made any dollar either bro
12/21/2022 4:37:45 PM	TORRES	Send me 2k
12/21/2022 4:38:26 PM	Lakra	Cash app or zelle or wire
12/21/2022 4:38:43 PM	TORRES	Cash app
12/21/2022 4:39:08 PM	TORRES	He got a cash app card I can just send him some
12/21/2022 4:39:17 PM	Lakra	Ok
12/21/2022 4:39:34 PM	Lakra	Will send tomorrow morning Waiting on a wire to hit my account
12/21/2022 6:17:33 PM	TORRES	Does ur boy buy lose material
12/21/2022 6:20:14 PM	Lakra	Lemme check
12/21/2022 6:20:21 PM	Lakra	Will text you in 10 min
12/21/2022 7:17:48 PM	TORRES	Now I got my boy calling me for his money or just to give him the cats back smfh I had grab a few from him
12/21/2022 7:18:02 PM	TORRES	This is bad business
12/21/2022 7:19:00 PM	Lakra	Bro I asked my guy to he is also not buying because of Christmas
12/21/2022 7:19:49 PM	Lakra	Its not bad business bro its just a little delay because of Christmas Tell you guy there are not even many buyers rn Atleast you're buying his stuff
12/21/2022 7:20:00 PM	Lakra	And are reliable
12/21/2022 7:21:53 PM	TORRES	It's bad business cuz I couldn't of sold it to u Friday Saturday Sunday Monday
12/21/2022 7:22:13 PM	TORRES	It's terrible businesses
12/21/2022 7:23:00 PM	TORRES	Hole fucking Christmas ruined cuz ur shit

12/21/2022 7:23:57 PM	TORRES	I could of just sold the cats completely now lam stuck with powder
12/21/2022 7:30:11 PM	Lakra	Okay bro just forgive me for this time and if you don't wanna do business after this powder deal on 26 its okay
12/21/2022 7:30:16 PM	Lakra	I understand
12/21/2022 7:30:34 PM	Lakra	And also I'll give you extra for your loss
12/21/2022 7:31:02 PM	TORRES	Smh
12/21/2022 7:31:42 PM	TORRES	Sorry not goin to help
12/21/2022 7:32:05 PM	TORRES	I need those 2000
12/22/2022 10:59:30 AM	TORRES	What's good
12/22/2022 11:06:49 AM	Lakra	Goldytech413
12/22/2022 11:06:56 AM	Lakra	Is your cash app right
12/22/2022 11:06:56 AM	TORRES	Yea
12/22/2022 11:07:27 AM	Lakra	I have to limit of 1800 left on cash app
12/22/2022 11:07:31 AM	Lakra	I am sending that
12/22/2022 11:07:51 AM	Lakra	Sent
12/22/2022 11:07:59 AM	Lakra	Rest tomorrow
12/22/2022 11:08:04 AM	Lakra	Okay?
12/22/2022 11:11:02 AM	TORRES	K
12/23/2022 12:23:15 AM	TORRES	What's the address he goin
12/23/2022 12:23:59 AM	Lakra	435 Elizabeth Ave, Somerset, NJ 08873
12/23/2022 10:02:14 AM	Lakra	What's his eta ?
12/23/2022 10:28:32 AM	TORRES	Just left a hour ago
12/23/2022 10:28:49 AM	Lakra	Ok np
12/23/2022 10:28:52 AM	Lakra	Lmk
12/23/2022 11:12:11 AM	TORRES	There always mad traffic in ny lol
12/23/2022 11:49:03 AM	TORRES	2500 on Monday Tuesday??
12/23/2022 12:26:43 PM	TORRES	5 min
12/23/2022 12:29:03 PM	Lakra	

311. In the text messages, TORRES and Lakra discuss the sale of catalytic converters and the sale of catalytic cores. Lakra sends a picture of what the cores will look like once extracted and sends an address in New Jersey for TORRES to have the items delivered. Lakra then tells TORRES that the refinery he intended to bring the cores to was closed and cancelled the trip. TORRES then accuses Lakra of working with federal investigators, which Lakra denies (“Now u just scare me u keep changing time day what’s the issue u working with the feds or something”). Lakra then tells TORRES that he cannot keep the cores in his house because of his pending federal case. TORRES then complains about having broken down the catalytic converters into powder for the transaction. It then appears that the transaction was completed on December 23, 2022, and the cash was sent to TORRES by Lakra via CashApp.

## **E. BANK TRANSACTIONS**

312. Investigators reviewed records for a Citizens Bank account for which TORRES is the sole signatory ending in 2835 (the 2835 ACCOUNT). For the time period of January, 2021 through December 2022, investigators identified \$134,700 in cash deposits made into the 2835 ACCOUNT. Investigators identified four checks totaling \$4,450 deposited into the 2835 ACCOUNT during June 2021 from salvage and core recycling entities.

313. From October 2021 through June 2021, investigators identified \$26,185 in electronic deposits from Downpipe Depot that investigators believe represent proceeds from the sale of stolen catalytic converters to Downpipe Depot, which is located in Connecticut.

Date	Amount
10/18/2021	2120
11/1/2021	3565
11/2/2021	1110
11/12/2021	4000
11/18/2021	1380
12/16/2021	5000
12/20/2021	130
1/6/2022	4000
1/10/2022	180
1/24/2022	200
2/1/2022	2000
2/7/2022	2500
<b>TOTAL</b>	<b>\$26,185</b>

314. Investigators also identified \$140,162 in incoming wire transfers to the 2835 ACCOUNT. Investigators believe that these wires represent the proceeds from the sale of stolen catalytic converters to Downpipe Dept and to DG Auto described above. As noted in the text message conversation, the wires represented partial payment for certain loads when the values exceeded the amount of cash that DG Auto had on hand.

Date	Amount	Sender
11/12/2021	\$8,000	Downpipe Depot & Recycling LLC
7/26/2022	\$19,132	DG Auto Parts LLC
8/11/2022	\$12,808	DG Auto Parts LLC
8/17/2022	\$30,302	DG Auto Parts LLC

8/17/2022	\$18,785	DG Auto Parts LLC
10/4/2022	\$16,835	DG Auto Parts LLC
10/19/2022	\$18,000	242 Monmouth Road Corp. <sup>19</sup>
10/25/2022	\$3,600	242 Monmouth Road Corp.
10/26/2022	\$12,700	242 Monmouth Road Corp.
<b>TOTAL</b>	<b>\$140,162</b>	

315. Investigators also identified \$21,550 in transfers to the 2835ACCOUNT from an account held by TORRES's mother. As noted above, TORRES directs Kolitsas to send money to his mother during their Facebook message conversations.

## **VII. BANK THEFT**

316. In addition to the prolific number of catalytic converter thefts, there is probable cause to believe that DAVILA, Santo FELIBERTY, and Alex OYOLA also engaged in bank thefts, and conspired to steal from federally insured bank.<sup>19</sup> These incidents took place on December 8, 2022, December 13, 2022, and December 15, 2022.

### **A. 12/8/2023, Tyngsborough, MA, Enterprise Bank ATM**

317. On Thursday, December 8, 2022, at 3:18 A.M., Tyngsborough Police received a report that a truck was attempting to pull an ATM machine from the Enterprise Bank located at 253 Middlesex Road in Tyngsborough, MA. Upon approaching the scene, a responding officer observed a Ford pick-up truck backing out of the Enterprise Bank driveway exit. The responding officer observed three individuals inside the truck, all of whom wore dark-colored face coverings. The responding officer attempted to stop the truck, which fled with its lights deactivated. The responding officer was able to make out a Connecticut registration plate on the truck, but the pursuit was terminated.

318. Officers then proceeded to the Enterprise Bank where the truck had been observed. Officers observed significant damage to the ATM machine. The face of the machine was detached and there was no

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<sup>19</sup> 242 Monmouth Corp. is an entity that does business as "Blacey's U-Pick Auto Parts" at 242 Monmouth Road, Wrightstown, NJ. According to the website for Blacey's, located at blaceys.com, this entity is operated by Lovin Khanna, the same individual who is the owner of DG Auto who was indicted in the Eastern District California and Northern District of Oklahoma. The website for Blaceys.com remains online and visible as of March 23, 2023.

cash inside of it. Bank officials assisted Tyngsborough PD detectives with review of the bank's cameras. Later that morning, Tyngsborough PD were contacted by Hudson, NH Police, who advised that multiple ATM parts had been located at 13 Oblate Drive, a wooded area in Hudson. The ATM parts were believed to be associated with the Tyngsborough ATM incident. A truck matching the description of the one used in the ATM theft would later be reported stolen from South Windsor CT, and then recovered on December 8, 2022, in Windham, NH.<sup>20</sup>

319. Tyngsborough Police continued their investigation and made contact with Enterprise Bank. It was determined that the suspects stole \$21,809 from the Enterprise Bank ATM.<sup>21</sup> The below surveillance images from Enterprise Bank show a Jay's Landscaping pickup truck bearing a CT registration, resembling K41969, backing up to the Enterprise Bank ATM and two suspects wearing dark clothing and face masks breaking into the ATM.

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<sup>20</sup> On Thursday, December 8, 2022, South Windsor, CT P.D. received a report of a motor vehicle larceny from Jay's Landscaping, located at 473 Sullivan Ave in South Windsor, CT. The owner of Jay's Landscaping had received a call from Windham, NH P.D. advising him that one of his work vehicles, a black 2003 Ford F-350 pickup truck bearing CT registration K41969, had been located at Outdoor Materials, a landscaping company located 117 miles away in Windham, NH. Windham NH Police further inquired as to the nature of the vehicle's presence in Windham, NH. The owner of Jay's landscaping confirmed that the vehicle had apparently been stolen the previous evening, and further stated that the vehicle was last parked in the Jay's Landscaping parking lot in South Windsor, CT on Wednesday, December 7, 2022 at 6:00 PM and was observed to be missing the following morning around 6:59 AM, around the time of his being notified by Windham, NH Police of the vehicle's presence in Windham, NH. Windham, NH P.D. further reported that the stolen vehicle had arrived at Outdoor Materials around 4:30 AM, on December 8, 2023. The black 2003 Ford F-350 pickup truck, matches the description of the vehicle used by the suspect in the breaking and entering of the Enterprise Bank ATM in Tyngsborough, MA. Additionally, signage on the side of the truck in surveillance video is consistent with "Jay's Landscaping." Investigators believe that the pickup truck stolen from Jay's Landscaping in South Windsor, CT is the same vehicle used by the suspects for the Enterprise Bank ATM theft which occurred during the early morning hours of December 8, 2022. Furthermore, the timing of the vehicle stolen from Jay's Landscaping during the overnight hours of December 7 into December 8, 2023, matches the Enterprise Bank ATM theft, which occurred at 3:18 AM of December 8, 2023. The distance between Enterprise Bank, 253 Middlesex Road in Tyngsborough, and Outdoor Materials, 1 Lexington Road in Windham, NH, is 14 miles. This indicates that following the ATM theft and subsequent pursuit by Tyngsborough P.D. of the suspect vehicle, which occurred around 3:18 A.M., the suspects parked the stolen vehicle at Outdoor Materials shortly thereafter, at 4:30 AM. Moreover, Tyngsborough Police reported that the ATM theft suspect vehicle was traveling northbound on Middlesex Road, crossing from Tyngsborough, MA into Nashua, NH upon termination of the pursuit. This route trajectory would allow the suspects to proceed to the area of Outdoor Materials in Windham, NH in order to dump the vehicle, which, at this point, was being targeted by area police as a result of the Enterprise Bank incident in Tyngsborough.

<sup>21</sup> Investigators are aware that Enterprise Bank is insured by the Federal Deposit Insurance Company and therefore the cash within the ATM was federally insured.



*Stolen Truck Backing up to ATM*



*Suspects Breaking into ATM*



*Stolen Truck Backing up to ATM*



*Suspect holding ATM cash box*

320. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incident.

- a. TARGET PHONE 1 utilized cell towers in Tyngsborough, MA at 3:12 AM and 3:17 AM on December 8, 2022. The cell towers are within 1.5 miles from the location of the Enterprise Bank ATM in Tyngsborough, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the Enterprise Bank ATM in Tyngsborough, MA.
- b. TARGET PHONE 1 utilized a cell tower in the Hudson, NH area from 3:23 AM until 3:47 AM, and 4:27 AM to 4:36 AM on December 8, 2022. The cell towers are within 1.5 miles from the location where the ATM parts were found. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity where the ATM parts were recovered in Hudson, NH.
- c. TARGET PHONE 1 utilized a cell tower in Windham, NH, between 4:06 AM and 4:20 AM on December 8, 2022. The cell towers is within 1000 feet from the location where the stolen truck was recovered in Windham, NH. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity where the stolen truck was recovered in Windham, NH.

- d. TARGET PHONE 1 utilized a cell tower located in Tyngsborough, MA on December 8, 2022 at 4:35 AM, and then proceeded to utilized a series of cell towers consistent with travel back to Springfield, MA, arriving in the area of 799 S. West Street, Feeding Hills, MA at approximately 6:30 AM on December 8, 2022.

321. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 5 utilized by FELIBERTY.

- a. TARGET PHONE 5 utilized a cell tower in Springfield, MA at 10:31 PM on December 7, 2022.
- b. During the period of 10:31 PM on December 7, 2022, through 7:27 AM on December 8, 2022, TARGET PHONE 5 was conspicuously off the network and registered no network activity. At 7:27 AM on December 8, 2022, TARGET PHONE 5 showed network location information in the area of south Springfield, MA. At approximately 8:03 AM on December 8 2022, TARGET PHONE 5 employed a cell tower located approximately 3000 feet from FELIBERTY's residence on Parker Street, Springfield, MA.

322. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 9 utilized by OYOLA.

- a. TARGET PHONE 9 utilized a cell tower in Springfield, MA on December 9, 2022, at 10:41 PM.
- b. During the period of 10:41 PM on December 7, 2022, through 7:34 AM on December 8, 2022, TARGET PHONE 9 was conspicuously off the network and registered no network activity. At 7:34 AM on December 8, 2022, TARGET PHONE 9 utilized a cell tower located in Springfield, MA.

323. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 10 utilized by FELIBERTY.

- a. TARGET PHONE 10 utilized a cell tower in South Windsor, CT, at 12:26 AM on December 8, 2022. This cell tower is approximately 1.5 miles from the location where the truck used in the theft was stolen. Network location information for TARGET PHONE 10 shows that it was in the immediate vicinity of where the truck was stolen.
- b. TARGET PHONE 10 utilized cell towers in Tyngsboro, MA at 2:43 AM, 2:44 AM, 2:45 AM, and 3:20 AM on December 8, 2022. The cell towers are approximately 1.5 miles from the location of the Enterprise Bank ATM. Network location information for TARGET PHONE 10 places it in the immediate vicinity of the Enterprise Bank ATM.
- c. Immediately following 3:20 AM on December 8, 2022, TARGET PHONE 10, begins utilizing cell towers consistent with travel to Hudson, NH and Windham, NH. At 3:33 AM on December 8, 2022, TARGET PHONE 10 utilized a cell tower approximately 3500 feet from where the ATM parts were recovered in Hudson, NH. At 4:08 AM on

December 8, 2022, TARGET PHONE 10 utilized a cell tower approximately 1000 feet from where the stolen truck was recovered in Windham, NH.

- d. Immediately after approximately 4:10 AM, on December 8, 2022, TARGET PHONE 10 began utilizing cell towers consistent with travel into Massachusetts via Route 3, and began utilizing cell towers in Massachusetts at approximately 4:48 AM on December 8, 2022. Following this, TARGET PHONE 10 utilized cell towers consistent with travel to Springfield, MA via I-495, I-290, and I-90.
- e. TARGET PHONE 10 utilized a cell tower approximately 1 mile from DAVILA's residence in Feeding Hills, MA at approximately 6:36 AM on December 8, 2022.

**B. 12/13/22, Chelmsford, MA, Scouting of Lowell 5 Bank ATM**

324. Investigators reviewed images contained within DAVILA's iCloud account that depicted free-standing ATMs. Specifically, investigators observed the three images of a free-standing ATM that according to metadata were captured at 1:26 AM, 1:27 AM, and 2:26 AM on December 13, 2022. These images suggested that R. DAVILA had been actively scouting ATM locations. The ATM images follow:



325. Lowell 5 Bank provided surveillance footage from their branch located at 23 Fletcher Street in Chelmsford for December 13, 2022, at 2:26 AM. The surveillance video reveals that two suspects wearing black arrive and walk to the ATM. They examine the ATM and one individual takes a photo using a cell phone. The suspect that takes a photograph is wearing a black hat with an Adidas logo, and is believed to be Rafael DAVILA. The other suspect points to the ATM as he walks around it. Two still images from the surveillance video follow:



326. Investigators reviewed historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA and TARGET PHONE 5 utilized by FELIBERTY, TARGET PHONE 9 utilized by OYOLA, and TARGET PHONE 10 utilized by FELIBERTY relative to December 13, 2022, at 2:26 AM (the date and time associated with the metadata of the images).

- a. DAVILA's TARGET PHONE 1 utilized cell towers in Chelmsford, MA from 2:20 AM to 2:37 AM on December 13, 2022. The cell towers are located within 1 mile from the ATM in Chelmsford, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the location of the ATM in Chelmsford, MA.
- b. FELIBERTY's TARGET PHONE 5 utilized cell towers in Chelmsford, MA at 2:29 AM, 2:30 AM, 2:34 AM, on December 13, 2022. The cell towers are located within 1 mile from the ATM in Chelmsford, MA. Network location information placed TARGET PHONE 5 in the immediate vicinity of the ATM in Chelmsford, MA.
- c. OYOLA's TARGET PHONE 9 utilized cell towers Shrewsbury, MA and Northborough, MA at 12:49 AM on December 13, 2022. TARGET PHONE 9 is otherwise conspicuously off the network from 11:41 PM on December 12, 2022, through 6:52 AM on December 13, 2022. This network activity is consistent with OYOLA powering down his cellular phone during the activity.
- d. FELIBERTY's TARGET PHONE 10 utilized a cell tower in Chelmsford, MA at 2:17 AM and 2:30 AM on December 13, 2022. This cell tower is located within 4000 feet of the ATM in Chelmsford, MA. Network location information placed TARGET PHONE 10 in the immediate vicinity of the ATM in Chelmsford, MA.

327. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FELIBERTY (utilizing TARGET PHONE 5) on December 12, 2022. Those text messages capture DAVILA and FELIBERTY coordinating meeting up at approximately 10:40 PM, prior to travelling to Chelmsford, MA to scout the Lowell 5 Bank ATM. Of note, FELIBERTY states that he has “talked to D”, meaning Alex OYOLA, a/k/a “DIRTY”, and that he is willing to participate (“I talked to D he’s down”).

Date/Time	Author	Content
12/12/2022 6:53:43 PM	FELIBERTY	What time you thinking ?
12/12/2022 6:54:22 PM	DAVILA	Looking like 10
12/12/2022 6:54:58 PM	FELIBERTY	Ok cool I'ma nap rn
12/12/2022 6:55:20 PM	DAVILA	Ok
12/12/2022 10:22:48 PM	FELIBERTY	I'm up and ready
12/12/2022 10:23:09 PM	DAVILA	Ok I just got back
12/12/2022 10:24:24 PM	FELIBERTY	Ok I'll head to the little house and I talked to D he's down
12/12/2022 10:29:37 PM	DAVILA	Ok cool. I'm home in 10. Gonna change up.

328. Investigators reviewed text messages between FELIBERTY (utilizing TARGET PHONE 5) and OYOLA (utilizing TARGET PHONE 9) on December 12, 2022. Those text messages capture FELIBERTY and OYOLA coordinating meeting up at approximately 11:20 PM, prior to travelling to Chelmsford, MA to scout the Lowell 5 Bank ATM.

Date/Time	Author	Content
12/12/2022 11:14:11 PM	FELIBERTY	Otw
12/12/2022 11:21:04 PM	OYOLA	Ok
12/12/2022 11:22:42 PM	FELIBERTY	Here pato
12/12/2022 11:26:00 PM	OYOLA	Ok

### **C. 12/15/23 Concord, MA, Chase Bank ATM**

329. On Thursday, December 15, 2022, at 3:14 A.M., Concord Police were notified by Chase Bank security of a possible ATM burglary in progress at the Chase Bank located at 1134 Main Street in Concord, MA. Chase Bank security advised Concord PD that a white male, dressed in all black and wearing yellow gloves, was spraying a surveillance camera with black spray paint. Upon arrival at the Chase ATM, officers observed the ATM ripped from its location and that the camera directly above the ATM was spray-painted black. Concord Police reported that no money had been stolen from the ATM because the suspects were unable to gain access to the vault of the machine. According to Chase Bank there was approximately

\$16,000 in cash within the ATM.<sup>22</sup> There was significant damage to the ATM, which was valued at \$65,000.

330. Chase Bank officials assisted officers in accessing the bank's surveillance camera footage from other cameras. Per the Concord Police report, the following timeline of events was reported to occur on the morning of the thefts:

- a. 3:05 AM: Suspect pickup truck drives by the Chase Bank on Baker Ave side.
- b. 3:10 AM: White male wearing yellow and black mechanic gloves, black winter hat/hood, with the bottom portion of his face covered and an unknown tool spray paints the drive-up, internal ATM camera and the overhang camera.
- c. 3:11 AM: Two-toned Ford F250 or F350 from 1999-2004, with what appeared to be a distinct, aftermarket fiberglass hydraulic bed cover backs up to the ATM.
- d. 3:11AM: Individual who spray paints cameras, opens a fiberglass hydraulic truck bed cover, while another party attempts to pry open the ATM with tool (unsuccessful).
- e. 3:11 AM: Both men successfully pry open the ATM but seem to realize money is not accessible.
- f. 3:12 AM: Suspects utilize a tow strap and pickup truck to uproot the ATM, causing significant damage.
- g. 3:13 AM: Three suspects lift the ATM back up, inspect the ATM, retrieve no money.
- h. 3:14 AM: Three suspects leave the area in the pickup truck, headed Southwest onto Old Bridge Road at a high rate of speed.
- i. 3:16 AM: Patrol Officers arrive on scene.

331. Still images from the surveillance video follow:



332. Maynard Police reported that on December 15, 2022, at approximately 2:40 AM, an officer observed a black pickup truck being followed by a black Dodge Challenger with New Jersey plate N56GB.

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<sup>22</sup> Investigators are aware that Chase Bank is insured by the Federal Deposit Insurance Company and therefore the cash within the ATM was federally insured.

The two vehicles were heading in the direction toward the Concord ATM. At approximately 3:30 AM, the same Maynard PD officer in the area of Powder Mill Road, observed the same black pickup truck and black Dodge Challenger bearing New Jersey plate N56GB driving away from the area of the Concord ATM. The vehicles were driving close to one another. The Maynard officer effected a motor vehicle stop on the Dodge Challenger, and it pulled to the side of the road but was never put in park. The officer opened his door and the Challenger took off at approximately 80 mph. The officer pursued the Challenger and the chase reached speeds well over 90 mph, and it ultimately evaded the officer.

333. According to the report, the black Dodge Challenger was believed to have been acting as a “bait car” to distract law enforcement from the black truck. A query of the black Dodge Challenger’s registration plate indicated the plate was listed as stolen out of Andover on November 24, 2022. Per Andover Police, both the New Jersey registration plate N56GNB observed on the Dodge Challenger and a South Dakota registration plate 1AR294 were stolen from a Courtyard Marriott Hotel located at 10 Campanelli Drive, Andover, MA. Investigators believe these plate thefts occurred on or about November 24, 2022, the same night DAVILA is believed to be involved in thefts of catalytic converters in Hooksett, New Hampshire.

334. On December 19, 2022, Maynard PD located the pick-up truck (VIN: 1FTNX21L13EA54954) which matched the suspect pick-up truck used in the Concord ATM incident. The vehicle was located in a parking lot located at 13 Apple Ridge Road in Maynard. The pick-up truck was towed from the parking lot and processed.

*1. Historical CSLI*

335. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the attempted Concord ATM incident.

- a. TARGET PHONE 1 utilized a cell site in Andover, MA, in direct proximity to the Courtyard Marriott on November 24, 2022, at 12:55 AM through 1:07 AM, and 5:21 AM, consistent with the theft of the license plates.

- b. TARGET PHONE 1 utilized cell towers in Maynard, MA on December 15, 2022, at 2:40 AM through approximately 3:30 AM, consistent with Maynard Police observations of the black Dodge Challenger.
- c. From 3:30 AM to 3:39 AM, TARGET PHONE 1 utilized cell towers consistent with westbound travel from Maynard, MA to Bolton, MA, consistent with the high-speed chase from Maynard Police.

336. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 5 utilized by FELIBERTY.

- a. From 10:02 PM to 10:32 PM on December 14, 2022, TARGET PHONE 5 employed cell towers consistent with travelling from FELIBERTY's residence on Parker Street, Springfield, MA to 799 S. West Street, Feeding Hills, MA. TARGET PHONE 5 continues to employ cell sites in the vicinity of 799 S. West Street, Feeding Hills, MA until 11:19 PM.
- b. During the period of 11:22 PM on December 14, 2022, through 6:00 AM on December 15, 2022, TARGET PHONE 5 was conspicuously off the network and registered no network activity. At 6:00 AM, TARGET PHONE 5 shows network location information in the vicinity of Allen Street, Springfield, MA. Then at 9:26 AM on December 15, 2022, employs a cell tower located in proximity to FELIBERTY's residence on Parker Street, Springfield, MA. This network activity is consistent with FELIBERTY turning off TARGET PHONE 5 during the crime.

337. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 9 utilized by OYOLA.

- a. TARGET PHONE 9 utilized a cell tower in Enfield, CT at 11:22 PM on December 14, 2022.
- b. During the period of 11:22 PM on December 14, 2022, through 6:03 AM on December 15, 2022, TARGET PHONE 9 was conspicuously off the network and registered no network activity. At 6:03 AM on December 15, 2022, employs a cell tower located in Springfield, MA. This network activity is consistent with OYOLA turning off TARGET PHONE 9 during the crime.

338. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 10 utilized by FELIBERTY.

- a. TARGET PHONE 10 utilized cell towers in Maynard, MA from 2:37 AM to 3:01 AM on December 15, 2022, consistent with Maynard Police observations of the Challenger and truck.
- b. TARGET PHONE 10 utilized a cell tower in Concord, MA at 3:03AM, on December 15, 2022. This cell tower is located approximately 1.5 miles from the location of the Concord ATM.

## 2. *Surveillance*

339. Additionally, investigators are aware that DAVILA is the owner and routine operator of a black Dodge Challenger which investigators have frequently observed through electronic and physical surveillance. Investigators observed DAVILA's black Dodge Challenger exit the driveway associated with 799 S. West Street in Feeding Hills on December 14, 2022, at 11:10 PM and return December 15, 2022, at 5:35 AM, which is a departure and arrival window consistent with DAVILA utilizing his black Dodge Challenger during the Concord ATM theft.

340. Investigators are aware through review of records, and physical and electronic surveillance that FELIBERTY utilizes a black 2019 Dodge Ram VIN: 1C6SRFHT1KN874287. On December 14, 2022, at approximately 10:34 PM, investigators observed a vehicle consistent with FELIBERTY's 2019 Dodge Ram back into the driveway of 799 S. West Street in Feeding Hills. This vehicle remains in the driveway until 5:38 AM, just following the arrival of the Dodge Challenger. This is consistent with the 2019 Dodge Ram being parked and FELIBERTY leaving in the black Dodge Challenger with DAVILA to commit the Concord ATM theft.

## 3. *Text Messages*

341. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FELIBERTY (utilizing TARGET PHONE 5) on December 14, 2022. Those text messages capture DAVILA and FELIBERTY coordinating meeting up at approximately 7:38 PM, prior to travelling to Concord, MA.

Date/Time	Author	Content
12/14/2022 3:20:47 PM	FELIBERTY	What's your ETA pato?
12/14/2022 7:22:19 PM	FELIBERTY	Yerrrr
12/14/2022 7:38:21 PM	DAVILA	I'm on the way to FP now sorry my truck needed mad love

342. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FELIBERTY (utilizing TARGET PHONE 5) on December 14, 2022. Those text messages capture

DAVILA and FELIBERTY coordinating meeting up at approximately 7:38 PM, prior to travelling to Concord, MA.

Date/Time	Author	Content
12/14/2022 9:29:34 PM	OYOLA	You here
12/14/2022 9:29:44 PM	FELIBERTY	Yeah
12/14/2022 9:29:55 PM	OYOLA	Ok cool

343. Investigators reviewed a text message conversation between DAVILA (utilizing TARGET PHONE 1) and FELIBERTY (utilizing TARGET PHONE 10) relating to the Concord ATM incident. It appears that these text messages depict coordination of the two vehicles, prior to and after the Concord ATM was ripped out.

Date/Time	Author	Content
12/15/2022 2:22:15 AM	FELIBERTY	I'm gonna pull over soon to switch . I'm getting tired af
12/15/2022 2:22:36 AM	DAVILA	Ok
12/15/2022 4:05:40 AM	DAVILA	I'm at Berlin, drive here using Waze:
12/15/2022 4:05:45 AM	DAVILA	<a href="https://waze.com/ul/hdrt0fntj0">https://waze.com/ul/hdrt0fntj0</a>
12/15/2022 4:25:28 AM	DAVILA	I'm at 2 - 44 Clearview Ave, Worcester, drive here using Waze:
12/15/2022 4:25:31 AM	DAVILA	<a href="https://waze.com/ul/hdrsbw76tm">https://waze.com/ul/hdrsbw76tm</a>
12/15/2022 4:25:36 AM	DAVILA	Get off exit 23
12/15/2022 4:25:36 AM	DAVILA	Get off exit 23
12/15/2022 4:25:47 AM	FELIBERTY	5 minutes
12/15/2022 4:26:17 AM	DAVILA	Liked "5 minutes "

## VIII. 1/12/23, NEW HAMPSHIRE JEWELRY STORE BURGLARIES

344. Investigators learned of two jewelry store burglaries that were reported on January 12, 2023, taking place in Derry, NH and Salem, NH. These two burglaries were committed by DAVILA, FELIBERTY and OYOLA. Based on the investigation thus, investigators believe that on January 10, 2023, the evening before the burglaries, DAVILA, FELIBERTY and OYOLA travelled to Derry, NH and Salem, NH to scout the locations and steal a vehicle that they would utilize to commit the burglaries.

### A. 1/12/23, Derry NH, Jewelry Store Burglary

345. According to Derry Police Report #23-72-OF, on the morning of January 12, 2023, Derry Police responded to a burglary of a jewelry store at Crystal Avenue in Derry, NH. Derry Police observed the scene and noted that the front door and display cases were smashed and hundreds of pieces of jewelry had been stolen. According to surveillance video, the front door to the store was smashed at 2:05 AM on

January 12, 2023. Three suspects enter for approximately two minutes, smashing display cases with hammers, and then stealing the jewelry. The suspects arrived and fled in a vehicle that was later determined to be a Hyundai Santa Fe SUV. The total value of the stolen jewelry was determined to be at least \$79,482, and the cost to repair the damage to the store was determined to be approximately \$11,812. A still image from the surveillance video of the burglary follows:



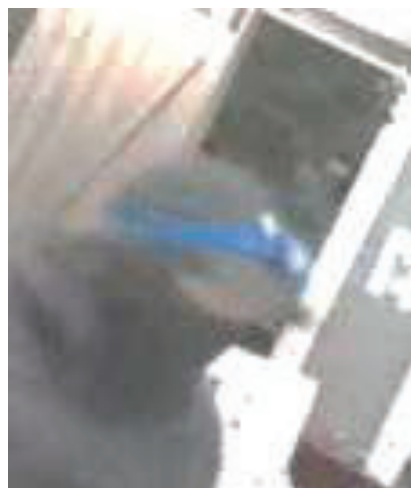
346. One suspect appears to be wearing a blue headlamp, black Adidas hat, white gloves and black sneakers with silver piping. The second suspect is wearing black clothing, a red headlamp, and brown gloves and carries a yellow hand tool (possibly a hammer). The third suspect is wearing black clothing, and red gloves. Still images from the surveillance video follow:



347. Of note, one suspect wearing black, and a blue headlamp, appears to be wearing sneakers with silver piping and a black hat with a logo that appears to match an Adidas logo:



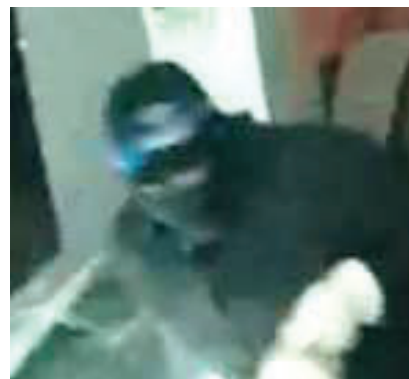
Back of Hat with White Logo



Front of Hat with White Logo



Front of Hat with White Logo Reflected in Mirror



Front of Hat with White Logo

348. A gray SUV that was later determined to be a Hyundai Santa Fe, used by the burglars. The plate attached to the Santa Fe was stolen. The Hyundai Santa Fe itself was stolen from Londonderry, NH between January 10 into January 11, 2023. This vehicle was reported stolen on January 11, 2023, at 10:17 AM, suggesting that the burglars had stolen it the night before the burglary.

**B. 1/12/23, Salem NH, Smoke Shop and Jewelry Store Burglaries**

349. According to Salem, NH Police Report #23-89-OF, Salem, NH Police responded to a burglary at a smoke shop taking place at approximately 2:59 AM on January 12, 2023, on South Broadway in Salem, NH. When officers arrived, the door was smashed and items were strewn about the floor. Ultimately, it was determined that nothing had been taken.

350. According to surveillance video, a Hyundai Santa Fe arrives and parks. The driver, who is wearing a blue headlamp, white gloves, sneakers with silver piping, and black Adidas hat, exits and walks to the street and then gives the thumbs up to the passengers in the vehicle. Following that, the suspect wearing brown gloves, red headlamp and carrying a yellow hammer exits and proceeds to smash the front door to the business. Once inside, the suspect takes nothing but throws two displays to the ground and promptly leaves within 30 seconds. Based on the same suspects being involved at the jewelry store, nothing being taken, and Hyundai Santa Fe being utilized, investigators believed that this smoke shop burglary was a distraction from the jewelry store burglary that took place about 10 minutes later. Still images from the smoke shop burglary were of high quality and depicted the suspects, including the Adidas hat worn under the blue headlamp. Still images from the surveillance video follow:



351. Suspect 1 is believed to be FELIBERTY. Suspect 2 is believed to be DAVILA. The black Adidas hat and sneakers with silver piping worn by the suspect with blue headlamp appear to match the Adidas hat and sneakers worn by DAVILA during various purchases at Home Depot and convenience stores. Images of the items worn by DAVILA follow:



352. According to Salem, NH Police Report #23-89-OF, on the morning of January 12, 2023, Salem Police responded to a burglary of a jewelry store on South Broadway in Salem, NH. Salem Police observed the scene and noted that the display cases were smashed and jewelry had been stolen. The total value of the stolen jewelry was determined to be at least \$57,758, and the cost to repair the damage was determined to be approximately \$9,435. According to surveillance video, the front door to the store was smashed at 3:10 AM on January 12, 2023. Three suspects that matched the general description of the individuals involved at the smoke shop and the Derry, NH burglary entered for approximately 2 minutes,

smashing display cases with hammers, and then stealing the jewelry. A still image from the surveillance footage follows:



**C. 1/11/2023, Suspects at Derry and Salem Jewelry Stores in Gray Minivan**

353. According to the police reports, Derry Police learned that the suspects had been at the store approximately twenty-four (24) hours before the burglary at 2:11 AM on January 11, 2023 and obtained surveillance video from a neighboring business. In the surveillance video, a gray minivan drives slowly by the store. This minivan appears to be a Chrysler Pacifica.



354. Moments later, the suspects walk to the front of store, and one of the suspects shines a flashlight inside. This subject is wearing black sneakers with white tops which are the same sneakers worn

by a suspect during the burglary. The subjects appear to examine the glass doors and the interior of the store. The subjects are in front of the store for a few minutes and then return to the minivan. A still image from the surveillance video depicting the minivan follows:



355. Salem Police reviewed surveillance video and determined that the suspects were at the Salem jewelry store on the night before the burglary, at 4:52 AM on January 11, 2023, shining a light into the store.

#### **D. Remote Surveillance of DAVILA's Residence**

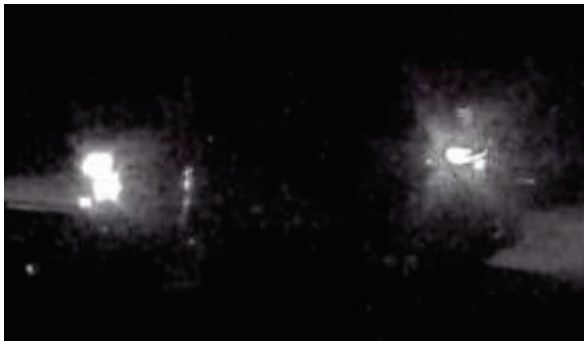
##### *1. 1/10/23 to 1/11/23*

356. Investigators reviewed surveillance footage captured by the pole camera monitoring 799 S. West Street in Feeding Hills between 11:00 PM on January 10, 2023, and 10:00 AM on January 11, 2023.

- a. On January 10, 2023, at 11:02 PM, a minivan was observed pulling into the driveway associated with 799 S. West Street in Feeding Hills. The front and rear light pattern are consistent with the lights observed on the video from Derry, NH on the morning of

January 11, 2022. On January 10, 2023, at 11:17 PM, a minivan was observed pulling out of the driveway associated with 799 S. West Street in Feeding Hills.

- b. On January 10, 2023, at 11:19 PM, a minivan was observed pulling into the driveway associated with 799 S. West Street in Feeding Hills, MA. The minivan departs at 11:25 PM. The front and rear light pattern are consistent with the lights observed on the video from Derry, NH on the morning of January 11, 2022.
  - i. FELIBERTY's TARGET PHONE 5 utilized a cell tower located in Feeding Hills, MA at 10:57 PM, 11:02 PM, and 11:05 PM, on January 10, 2023.
  - ii. FELIBERTY's TARGET PHONE 10 utilized a cell tower located in Feeding Hills, MA at 11:18 PM, 11:19 PM, 11:21 PM, 11:22 PM, 11:23 PM, on January 10, 2023.
  - iii. OYOLA's TARGET PHONE 9 utilized a cell tower located in Feeding Hills, MA at 11:07 PM, 11:11 PM, 11:14 PM, 11:15 PM, on January 10, 2023.



*Pole Camera Still Image*

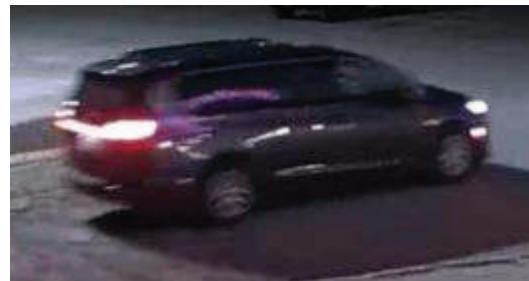


*1/11/23 Derry NH Still Image Flipped*

- c. The suspects shine lights into the jewelry stores at 2:11 AM, and 4:52 AM on January 11, 2023.
- d. On January 11, 2023, at 7:37 AM, a gray Chrysler Pacifica minivan was observed pulling into the driveway associated with DAVILA's residence in Feeding Hills and quickly backing into the side yard out of view. The minivan is also a visual match the minivan observed on the video from January 11, 2023, in Derry, NH.<sup>23</sup>



*Pole Camera Still Image*



*1/11/23 Derry NH Still Image*

<sup>23</sup> This minivan is believed to be the same minivan referenced by FELIBERTY and DAVILA during the January 9, 2023, catalytic converter thefts described above.

- e. On January 11, 2023, at 7:39 AM, Rafael DAVILA was observed walking from the side yard towards the front door of the residence. Notably, he is, a black Adidas hat and black shirt with white writing on it. While DAVILA is exiting, the gray Chrysler Pacifica minivan emerges and leaves the driveway.

2. *1/11/23 to 1/12/23*

357. Investigators reviewed surveillance footage captured by the pole camera monitoring 799 S. West Street in Feeding Hills between 12:00 PM on January 11, 2023, and 11:00 AM on January 12, 2023.

- a. On January 11, 2023, at 10:56 PM, a minivan is observed pulling into the driveway at 799 S. West Street, and an unknown individual is observed walking away from the car towards the residence. On January 11, 2023, at 11:16 PM, a minivan is observed exiting the driveway at 799 S. West Street and departs.
  - i. FELIBERTY's TARGET PHONE 10 utilized a cell tower located in Feeding Hills, MA at 10:52 PM, 10:53 PM, 10:57 PM, 11:10 PM, 11:11 PM, 11:15 PM, 11:17 PM, 11:18 PM, 11:19 PM, on January 11, 2023.
- b. The burglaries in Derry, NH and Salem, NH took place at 2:10 AM, 2:59 AM, and 3:10 AM, on January 12, 2023.
- c. On January 12, 2023, at 5:10 AM, a minivan was observed pulling into the driveway at DAVILA's residence in Feeding Hills and immediately past the driveway into the rear yard out of view. This activity is believed to be DAVILA, FELIBERTY and OYOLA returning after the theft and travelling to the rear of DAVILA's residence to unload the stolen property into DAVILA's basement, which has a door accessible from the rear of the premises.
- d. On January 12, 2023, at 5:19 AM, a minivan emerges from the side yard and parks directly next to the Dodge Challenger.
  - i. FELIBERTY's TARGET PHONE 10 utilized a cell tower located in Feeding Hills, MA at 5:06 AM, 5:08 AM, on January 12, 2023.
  - ii. OYOLA's TARGET PHONE 9 utilized a cell tower located in Feeding Hills, MA at 5:06 AM, 5:12 AM, 5:15 AM, 5:16 AM, 5:31 AM, 5:35 AM, 5:44 AM, 5:51 AM, 6:06 AM, 6:11 AM, 6:25 AM, 6:32 AM, 6:37 AM, 6:41 AM, 6:43 AM, 6:49 AM, 6:53 AM, on January 12, 2023.
- e. On January 12, 2023, at 7:25 AM, FELIBERY and OYOLA exited DAVILA's residence, entered the gray Chrysler Pacifica minivan, and pulled out of the driveway at 7:27 AM. OYOLA is outlined in red. FELIBERTY is outlined in blue.



- f. On January 12, 2023, at 8:05 PM, a truck backs into the parking spot at DAVILA's residence and parks.
- i. FELIBERTY's TARGET PHONE 5 utilized a cell tower located in Feeding Hills, MA at 8:09 PM, 9:32 PM, 9:45 PM, 10:28 PM, and 10:34 PM on January 12, 2023.

#### **E. HISTORICAL CSLI**

358. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. Investigators reviewed historical CSLI for TARGET PHONE 1 for the times approximate to the suspicious activity in Derry, NH at 2:11 AM on January 11, 2023. TARGET PHONE 1 utilized cell towers in Derry, NH, from 2:02 AM until 3:09 AM on January 11, 2023. The cell towers are within 1.5 miles from the location of the burglary in Derry, NH. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the burglary in Derry, NH.
- b. Investigators reviewed historical CSLI for TARGET PHONE 1 for the times approximate to the suspicious activity in Salem, NH on January 11, 2023. TARGET PHONE 1 utilized a cell tower in Salem, NH at 1:54 AM on January 11, 2023.
- c. Investigators reviewed historical CSLI for TARGET PHONE 1 for the times approximate to the burglary in Derry, NH at 2:05 AM on January 12, 2023. TARGET PHONE 1 uses cell sites in Derry, NH from 1:25 AM to 1:45 AM. The cell towers are within 1.5 miles from the location of the burglary in Derry, NH. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the burglary in Derry, NH.
- d. Investigators noted that the CSLI for TARGET PHONE 1 shows that it commences using cell towers in Derry, NH at about 1:22 AM until 1:45 AM. After 1:45 AM, TARGET PHONE 1 conspicuously registers no network activity until 3:33 AM when it uses a cell tower in Tewksbury, MA, and then utilizes cell towers consistent with travel to Springfield, MA, via I-495 and I-90, arriving in the area of 799 S. West Street in Feeding Hills, MA, at approximately 5:05 AM.

- e. As noted, the burglaries take place at 2:05 AM in Derry, NH and 3:09 AM in Salem, NH. This network activity is consistent with DAVILA turning off TARGET PHONE 1 during the burglaries and turning TARGET PHONE 1 on after the burglaries are completed, once they have made their escape back into Massachusetts.

359. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 10 utilized by Santo FELIBERTY relative to the incidents.

- a. Investigators reviewed historical CSLI for TARGET PHONE 10 for the times approximate to the suspicious activity in Derry, NH at 2:11 AM on January 11, 2023. TARGET PHONE 10 utilized cell towers in Derry, NH, from 2:03 AM until 3:21 AM on January 11, 2023. The cell towers are within 1.5 miles from the location of the burglary in Derry, NH. Network location data for TARGET PHONE 10 placed it in the immediate vicinity of the burglary in Derry, NH.
- b. Investigators reviewed historical CSLI for TARGET PHONE 10 for the theft of the Hyundai Sante Fe in Londonderry, NH on January 11, 2023. TARGET PHONE 10 utilized a cell tower in Londonderry, NH, at 3:32 AM on January 11, 2023. The cell tower is within 3200 feet from the location of the theft of the Hyundai Sante Fe in Londonderry, NH. Network location data for TARGET PHONE 10 placed it in the immediate vicinity of the theft of the Hyundai Sante Fe in Londonderry, NH.
- c. Investigators reviewed historical CSLI for TARGET PHONE 10 for the times approximate to the suspicious activity in Salem, NH at 4:52 AM on January 11, 2023. TARGET PHONE 10 utilized cell towers in Salem, NH from 4:29 AM to 4:55 AM on January 11, 2023. The cell towers are within 2 miles from the location of the burglary in Salem, NH. Network location data for TARGET PHONE 10 placed it in the immediate vicinity of the burglary in Salem, NH. Shortly thereafter, TARGET PHONE 10 began utilizing cell towers in Massachusetts starting at approximately 5:01 AM on January 11, 2022.
- d. Investigators reviewed historical CSLI for TARGET PHONE 10 for the times approximate to the burglary at the jewelry store in Derry, NH at 2:05 AM on January 12, 2023. TARGET PHONE 10 utilized cell sites in Derry, NH from 1:25 AM to 2:25 AM. The cell towers are within 1.5 miles from the location of the burglary in Derry, NH. Network location data for TARGET PHONE 10 placed it in the immediate vicinity of the burglary in Derry, NH.
- e. Investigators reviewed historical CSLI for TARGET PHONE 10 for the times approximate to the burglaries at the smoke shop and jewelry store in Salem, NH at 2:59 AM and 3:10 on January 12, 2023. TARGET PHONE 10 utilized cell towers in Salem, NH from 2:33 AM to 2:55 AM. The cell towers are within 2 miles from the location of the burglary in Derry, NH. Network location data for TARGET PHONE 10 placed it in the immediate vicinity of the burglaries at the smoke shop jewelry store in Salem, NH.
- f. Immediately following the burglaries in Salem, NH, TARGET PHONE 10 began utilizing cell towers in the area of Methuen, MA at approximately 3:26 AM on January 12, 2023, and then utilized cell towers consistent with travel to Springfield, MA via I-495 and I-90. At approximately 5:10 AM on January 12, 2023, TARGET PHONE 10 utilized

a cell tower approximately 1 mile from DAVILA's residence at 799 S. West Street in Feeding Hills, MA.

**F. Text Messages**

360. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FELIBERTY (utilizing TARGET PHONE 5) on January 10, 2023, prior to the casing of the jewelry stores on January 11, 2023. Those text messages capture DAVILA and FELIBERTY coordinating meeting up at approximately 10:09 PM on January 10, 2023, prior to travelling to Derry, NH, Londonderry, NH, and Salem, NH, in the early morning hours on January 11, 2023.

Date/Time	Author	Content
1/10/2023 3:06:26 PM	FELIBERTY	Idk what happened there the call just hung up. Call me when you can
1/10/2023 6:36:50 PM	FELIBERTY	We in
1/10/2023 6:37:04 PM	DAVILA	Aight coo
1/10/2023 6:39:40 PM	FELIBERTY	Little house 9:30
1/10/2023 7:11:34 PM	DAVILA	Ok
1/10/2023 10:05:35 PM	FELIBERTY	Otw
1/10/2023 10:09:01 PM	DAVILA	I'm here


361. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and FELIBERTY (utilizing TARGET PHONE 5) on January 12 and 13, 2023, which is after the burglaries. Those text messages capture DAVILA and FELIBERTY sending a link for gold prices that would be consistent their valuing the stolen jewelry for its scrap value. Later in the conversation, DAVILA sends FELIBERTY a screen capture of a "Note" that is titled "Split", which investigators believes describes the split of the proceeds between DAVILA (listed as "R" for Rafael), FELIBERTY (listed as "S" for Santo) and OYOLA (listed as "A" for Alex). The note indicates a price for various pieces of jewelry and metals ("silv bar", "18k w plat ring", "tennis bracelet", "loose stones"). This list of items accurate reflects in general terms the nature of the jewelry stolen during the burglaries in Derry, NH and Salem, NH. The note lists a total of \$24,318 being divided by 3, equaling \$8,106. Then in the conversation, DAVILA tells FELIBERTY that he has \$13,600 and that he is owed \$5,241 by another individual whose identity is known to investigators. Investigators believe this other individual is monetizing the stolen jewelry, and he has not completely paid DAVILA for jewelry.

Date/Time	Author	Content
1/12/2023 6:31:16 PM	FELIBERTY	give me a minute
1/13/2023 1:26:55 AM	FELIBERTY	give me a minute
1/13/2023 8:36:40 AM	FELIBERTY	Lmk when you're up gay fish
1/13/2023 8:39:07 AM	DAVILA	I'm up wtw
1/13/2023 3:42:46 PM	FELIBERTY	<a href="https://www.kitco.com/charts/livegold.html">https://www.kitco.com/charts/livegold.html</a>
1/13/2023 3:43:19 PM	FELIBERTY	Jumped like \$20 it's gonna keep going 🤖
1/13/2023 3:44:28 PM	DAVILA	Hell yea
1/13/2023 10:35:38 PM	DAVILA <sup>24</sup>	
1/13/2023 10:36:17 PM	DAVILA	So far I have \$13600. He said he'll have the rest in the morning.
1/13/2023 10:36:46 PM	DAVILA	He owes \$5241
1/14/2023 10:48:37 AM	FELIBERTY	Yeoooo

<sup>24</sup> Due to the manner of how the text messages were acquired, the image that was sent was not reproduced in the conversation thread. Rather, I believe that this image ("IMG\_0849.PNG") was the one sent in this text message based on the content, context and the fact that this image was the most recent image captured on DAVILA's iPhone prior to an image being sent to FELIBERTY. Additionally, as observable in the image, the screen capture reveals a "10:34" time in the phone, and the photo was sent at 10:35 PM.

1/14/2023 12:49:19 PM	DAVILA	Yoo I just got up
1/14/2023 1:53:07 PM	FELIBERTY	I read that message wrong 🙄. Yeah bro just lmk when it's all ready. I feel like I'm harassing you now lol so ill just wait on you

362. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and OYOLA (utilizing TARGET PHONE 9) on January 12 and 13, 2023, which is after the burglaries. In the conversation, OYOLA asks DAVILA if there is any update on the money that DAVILA owes (“Any word on that bread”). DAVILA responds by sending the same list that he sent to FELIBERTY entitled “Split.” DAVILA also informs OYOLA that he has \$13,600 and that the person buying the stolen jewelry owes \$5,241 and that he will have the money the following day.

Date/Time	Author	Content
1/12/2023 7:37:17 PM	OYOLA	You here broody
1/12/2023 7:37:32 PM	DAVILA	Yea
1/12/2023 7:37:46 PM	OYOLA	Ok cool
1/13/2023 5:16:45 PM	OYOLA	Any word on that bread
1/13/2023 10:34:59 PM	DAVILA <sup>25</sup>	 <p>The screenshot shows a text message titled "Split" with the following content:</p> <p>S 685+ 129 = 814 +136 =950  R 1060+ 523 = 1583  A 1779 + 1185 = 2944  = \$5,477</p> <p>Original  18k w plat ring 58g  14k 496g  Bench 319g  SS 893g  Silv bar 100oz</p> <p>Final  18k 64.8g \$2130  Plat-6.7g \$174  10k 1g \$20  14k 463.6g \$14,020  14k tennis bracelet 18.4g \$735  Loose stones 8g  SS 896g \$617  Silv bar \$2000  Bench NG. = \$18,841 w/o ten bracelet</p> <p>\$18,841+\$5477=\$24,318 /3= \$8106  A 8106-2944=\$5,162  S 8106-950= \$7156  R 8106-1583= \$6523</p>

<sup>25</sup> Due to the manner of how the text messages were acquired, the image that was sent was not reproduced in the conversation thread. Rather, I believe that this image (“IMG\_0849.PNG”) was the one sent in this text message based on the content, context and the fact that this image was the most recent image captured on DAVILA’s iPhone prior to

1/13/2023 10:35:30 PM	DAVILA	So far I only got \$13600. He said he'll have the rest tomorrow morning
1/13/2023 10:37:01 PM	DAVILA	He owes \$5241
1/13/2023 10:39:43 PM	OYOLA	Ok cool my boy

363. Investigators reviewed text messages between FELIBERTY (utilizing TARGET PHONE 5) and OYOLA (utilizing TARGET PHONE 9) on January 10, 2023, which is the night before the burglaries, when the suspects travel to New Hampshire to scout the jewelry stores. In the conversation, OYOLA and FELIBERTY coordinate and meet up at around 9:00 PM.

Date/Time	Author	Content
1/10/2023 6:07:13 PM	FELIBERTY	Yeooo
1/10/2023 6:13:15 PM	OYOLA	Yoooo
1/10/2023 6:37:11 PM	OYOLA	You tell me the time
1/10/2023 6:39:46 PM	FELIBERTY	9:30 pick me up
1/10/2023 6:44:56 PM	OYOLA	Ok perfect
1/10/2023 9:32:46 PM	FELIBERTY	I'm ready
1/10/2023 9:36:39 PM	OYOLA	Ok getting dressed now
1/10/2023 9:00:56 PM	OYOLA	Here
1/10/2023 9:01:04 PM	FELIBERTY	Coming

364. Investigators reviewed text messages between FELIBERTY (utilizing TARGET PHONE 5) and OYOLA (utilizing TARGET PHONE 9) on January 11, 2023, which is before the burglaries. In the conversation, OYOLA and FELIBERTY coordinate and meet up at around 10:17 PM prior to heading out to commit the burglaries in Derry, NH and Salem, NH.

Date/Time	Author	Content
1/11/2023 9:49:12 PM	OYOLA	About to head your way in a few minutes
1/11/2023 9:59:46 PM	FELIBERTY	Ok
1/11/2023 10:06:14 PM	OYOLA	Otw
1/11/2023 10:17:25 PM	OYOLA	Outside
1/11/2023 10:17:39 PM	FELIBERTY	Ok coming out

365. Investigators reviewed text messages between FELIBERTY (utilizing TARGET PHONE 5) and OYOLA (utilizing TARGET PHONE 9) on January 15, 2023, which is after the burglaries during the time when DAVILA should have paid the outstanding balance. In the conversation, OYOLA and FELIBERTY send a link to a website to a business that buys precious metals for scrap. OYOLA suggests

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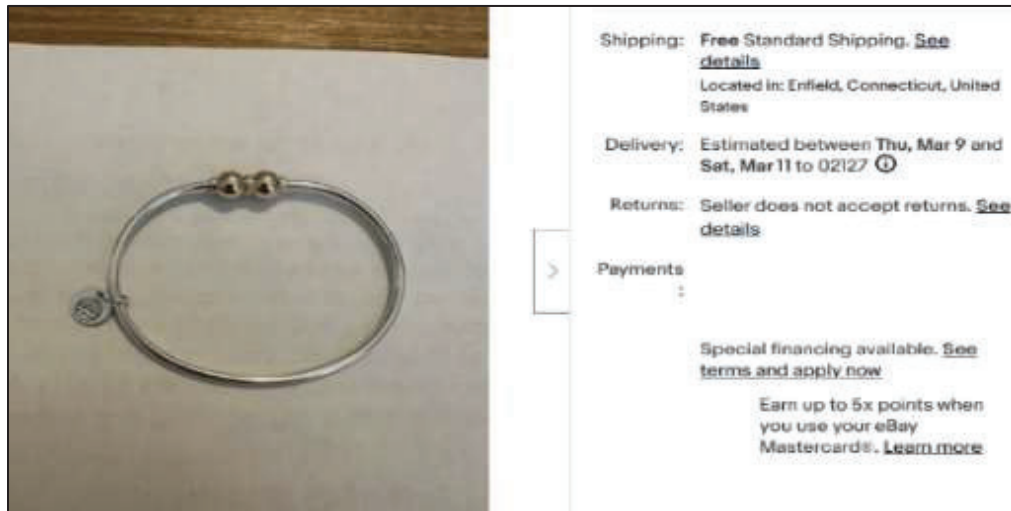
an image being sent to OYOLA. Additionally, as observable in the image, the screen capture reveals a "10:34" time in the phone, and the photo was sent at 10:34 PM.

that they call and ask what percentage the business pays. FELIBERTY agrees and states that he is going to call around, because DAVILA (“This bum”) still has not paid OYOLA and FELIBERTY the outstanding balance.

Date/Time	Author	Content
1/15/2023 12:48:54 PM	FELIBERTY	<a href="https://www.northeastpreciousmetals.com">https://www.northeastpreciousmetals.com</a>
1/15/2023 12:52:26 PM	OYOLA	Exactly all we have to do is just call them and ask what percentage do they pay
1/15/2023 12:53:14 PM	FELIBERTY	I found a bunch I'm gonna call around Tuesday. This bum still hasn't paid the balance it's Sunday
1/15/2023 12:56:36 PM	OYOLA	Exactly
1/15/2023 12:58:29 PM	FELIBERTY	<a href="https://www.preciousmetalsreclaiming.com/gold-jewelry-buyers.htm">https://www.preciousmetalsreclaiming.com/gold-jewelry-buyers.htm</a>

### G. eBay Records

366. Investigators reviewed records from eBay and also reviewed FELIBERTY's eBay page (username Santo860) and saw that FELIBERTY listed and sold a Cape Cod Bracelet Sterling Silver Double Bead 7-inch bracelet for \$90 dollars. This item matches one of the pieces of jewelry stolen from Derry, NH during the January 12, 2023 burglary.<sup>26</sup> A screen capture of the eBay listing follows:



<sup>26</sup> The item was listed for sale on January 29, 2023, and the item was sold on February 3, 2023. The item title states, "Cape Cope Bracelet double ball 14k & 925 sterling sliver 7"". In the item description it states "Cape Cope Bracelet double ball 14k & 925 sterling sliver 7". Worn twice. In great condition. 100% authentic Cape Cod bracelet 7". Double ball 14k and 925 sterling silver bangle. Made in USA PLEASE LOOK AT ALL PHOTOS".

367. The bracelets stolen from the Derry, NH jewelry store are an exact match in both look and metal characterization. The sale of the bracelet by FELIBERTY is 22 days after the robbery in Derry, NH. A still image provided by the Derry jewelry store of their inventory of Cape Cod bracelets follows:



## IX. OTHER THEFTS

### A. 12/14/22, Hooksett, NH Trailer Theft and Acton, MA Snowblower Theft

368. According to Hooksett, NH Police Report 22HKS-889-OF, on December 14, 2022, Hooksett Police Department received a report of a trailer stolen from a business. The victim reported that she reviewed security video and observed two unknown trucks pull into the lot at approximately 2:34 AM. At approximately 2:39 AM one of the vehicles, an apparent pickup truck, reversed up to the trailer and drove away with it.<sup>27</sup> Officers reviewed the surveillance video confirmed that a pickup truck and sedan appearing to be a Dodge Challenger were involved in the theft.<sup>28</sup> No further investigative leads were successful.<sup>29</sup> The trailer was valued at approximately \$10,000.<sup>30</sup>

<sup>27</sup> The victim reported that they always place a lock on the trailer, with an orange cone on top of it to protect the lock. The victim reported finding the orange cone in the wood line, and found the lock broken on the ground where the trailer was. There is no indication within the report that any of these items were seized as evidence, and there are no scene photographs showing the lock, cone, or area where the trailer was parked.

<sup>28</sup> In the report, the investigating officer states that he observed surveillance video from the incident, however there was no video submitted into evidence. After inquiry, the officer advised he never recovered the video to be placed into evidence. The victim informed investigators that she retained still images from the video, which she forwarded.

<sup>29</sup> A tip was received identifying an individual residing in Methuen, MA to be responsible for the theft. This individual claimed to have been in the Dominican Republic at the time of the theft. With the additional direct evidence gathered from DAVILA's iCloud, this individual was excluded as a suspect.

<sup>30</sup> On Wednesday March 8, 2023, investigators learned that GEICO had paid the victim \$8,300.00 based on the theft claim.

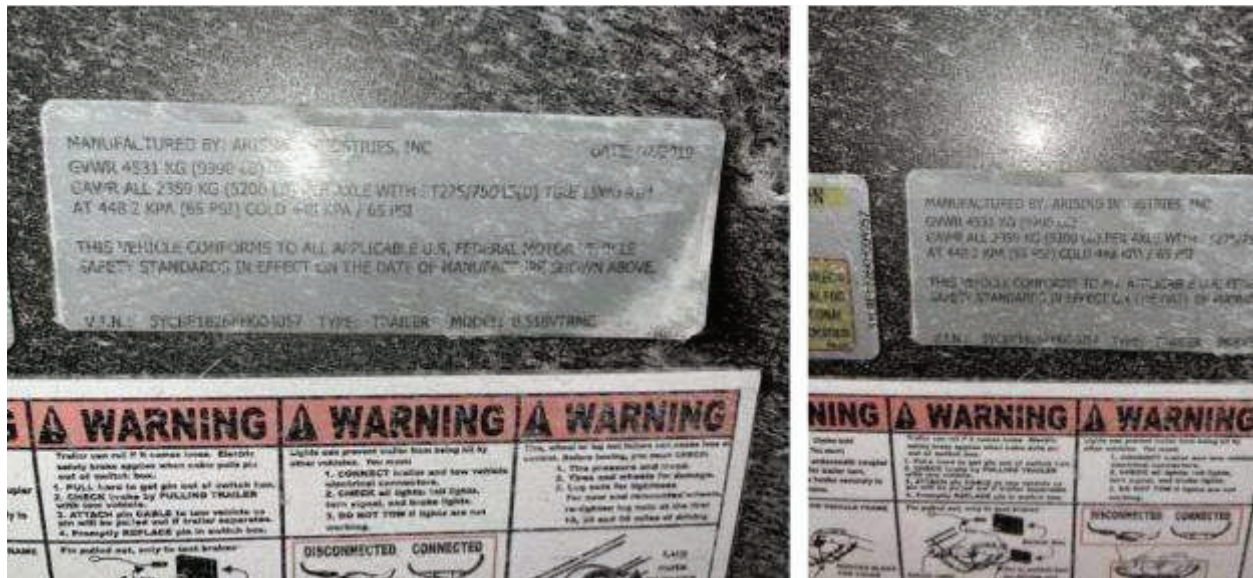
369. According to Acton Police Report 22ACT-1664-OF, on December 14, 2022, Acton Police received a report of snowblowers having been stolen from a hardware store on Main Street, Acton, MA. The hardware store reported the theft taking place overnight during December 13, 2022, into December 14, 2022. No pertinent surveillance video was recovered from the area. The hardware store reported the following snowblowers having been taken:

- 1 Craftsman color red (store use) valued @ \$200.00
- 1 Honda color red (store use) valued @ \$200.00
- 1 Ariens Platinum 24 Model 921063 SN 003805 valued @ \$1,999.99
- 3 Ariens Deluxe Sho Model 921048 SN 227389/227006/UNKNOWN valued @ \$1,699.99
- Ariens Classic 24 Snow blower unknown serial number valued at \$1,149.00

*1. Images and Text Messages*

370. Investigators located digital evidence from DAVILA's iCloud account that demonstrated DAVILA, FELIBERTY and OYOLA's involvement in the theft of the trailer from Hooksett, New Hampshire, and the Acton theft of snowblowers.

371. Investigators reviewed still images captured on the day of the theft displaying a description of a vehicle and its associated VIN. Subsequently, a query of this VIN displayed in the image (5YCBE1826KH004057) returned a response that the VIN was associated with the trailer stolen from Hooksett, NH on December 14, 2022. This photograph therefore demonstrates that DAVILA and co-conspirators were associated with the trailer theft. Still images of the stolen trailer's VIN, recovered from DAVILA's iCloud follow.



372. Investigators also located an image of a trailer in DAVILA's iCloud data. On March 1, 2023, investigators met with the victim to show her a photograph of a trailer obtained from R. DAVILA's iCloud. Upon viewing the photograph, the victim identified it as her stolen trailer, and provided pictures of the stolen trailer. Comparison of the victim's photographs reveals a visual match to the one depicted in the photograph found in R. DAVILA's iCloud data. The photograph from R. DAVILA's iCloud that was shown to the victim and the photograph provided by the victim follow:



DAVILA iCloud IMAGE SHOWN TO VICTIM



IMAGE SUPPLIED TO INVESTIGATORS BY VICTIM

373. Investigators reviewed R. DAVILA's iCloud data and identified a "Note" dated December 16, 2022, that reflects the same snowblowers stolen from the Acton hardware store. The final numbers at the bottom are believed to reflect calculation of profits per suspect. Specifically, "S" is believed to be "Santo" FELIBERTY, "R" is believed to be a reference to RAFAEL DAVILA, and "D" is believed to be

a reference to Alexander “DIRTY” OYOLA. The note stated the following, with the items reported stolen from the hardware store situated to the right for comparison purposes:

Note recovered from R. DAVILA’s iCloud <sup>31</sup>	Property Stolen from Acton, MA hardware store on December 14, 2022
Inventory 3 st24le ariens \$1450ea 1 ariens st24dle platinum \$2300 2 st28dle deluxe \$1550 1 st24e classic ariens \$1150 Used craftsman Used toro  3 spirit II e-210 \$550 1 genesis II E-315 \$800  S 1450 1550 1150 R open 1550 1450 2 used ones D 2300 1450	1 Craftsman color red (store use) valued @ \$200.00  1 Honda color red (store use) valued @ \$200.00  1 Ariens Platinum 24 Model 921063 SN 003805 valued @ \$1,999.99  3 Ariens Deluxe Sho Model 921048 SN 227389/227006/UNKNOWN valued @ \$1,699.99  Ariens Classic 24 Snow blower unknown serial number valued at \$1,149.00

374. Investigators also identified photographs stored in DAVILA’s iCloud data that depict boxes with stickers that state the same make (Ariens brand), models and serial numbers stolen from the Acton, MA hardware store. The metadata associated with these images indicates they were taken on December 14, 2022, at 6:28 AM and 6:29 AM (i.e., in the hours after the theft). Based upon the sequence and historical CSLI, investigators believe that DAVILA, FELIBERTY, and OYOLA utilized the stolen trailer from Hooksett, NH, to steal the snow blowers from Acton, MA, and transport them back to Springfield, MA. The images of the boxes with stickers follow:

<sup>31</sup> Additional thefts of grills are also believed to be listed (“spirit II” and “genesis II”) whose origin have not yet been identified.



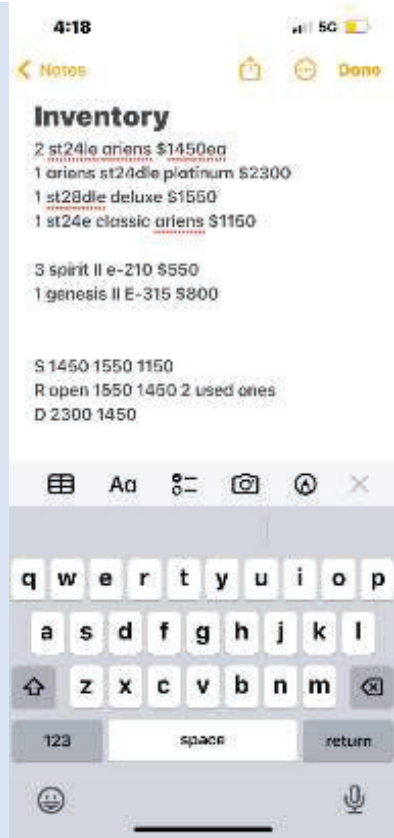
375. Investigators identified a text message conversation between DAVILA (utilizing TARGET PHONE 1) and FELIBERTY (utilizing TARGET PHONE 10) taking place during the trailer theft. The text messages follow with explanatory notes by investigators.

Date/Time	From	Body	Notes
12/14/2022 5:13AM	FELIBERTY (TP10)	What street	FELIBERTY asking where they are going
12/14/2022 5:14AM	DAVILA (TP1)	Chicopee st next to rmv	DAVILA responding with an address.

376. This short text is relevant as the trailer is stolen at 2:43 AM, and investigators believe DAVILA and co-conspirators then traveled to Acton where they committed a theft of snowblowers from Ace Hardware before returning to the Springfield area. Investigators believe that “Chicopee st next to the rmv” refers to 957 Chicopee Street, Chicopee, MA, which is the location of “Fonseca’s Market” which is business associated with coconspirator Carlos FONSECA.

377. Investigators identified a text message conversation between DAVILA (utilizing TARGET PHONE 1) and FELIBERTY (utilizing TARGET PHONE 5) relating to the trailer theft and snow blower theft. In those messages, DAVILA and FELIBERTY coordinate meeting up around 7:40 PM on December 14, 2022. The following day, on December 15, 2022, DAVILA sent FELIBERTY a screen capture of a note listing the stolen property from Acton and breakdown in value, and the profit split.

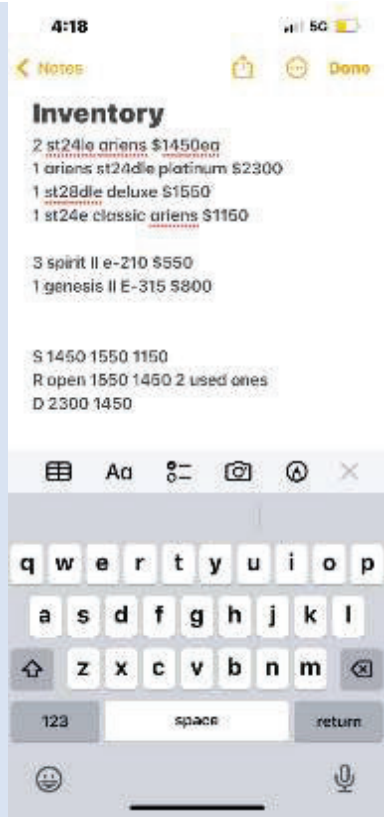
Date/Time	From	Content
12/14/2022 7:38:21 PM	DAVILA	I’m on the way to FP now sorry my truck needed mad love
12/15/2022 1:33:31 PM	FELIBERTY	Hmu when you’re up
12/15/2022 1:34:56 PM	DAVILA	I’m going back to sleep. I had to get up to get a haircut. I just finished
12/15/2022 1:36:44 PM	DAVILA	You get the uhaul yet?
12/15/2022 3:35:32 PM	FELIBERTY	9 minutes

12/15/2022 4:18:55 PM <sup>32</sup>	DAVILA	
12/15/2022 4:20:21 PM	DAVILA	That's ya list

378. Investigators identified a text message conversation between DAVILA (utilizing TARGET PHONE 1) and OYOLA (utilizing TARGET PHONE 9) relating to the trailer theft and snowblower theft. In those messages, investigators located DAVILA sending OYOLA a screen capture of the same note listing the Acton stolen property and breakdown in value.

Date/Time	From	Content
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<sup>32</sup> Due to the manner of how the text messages were acquired, the image that was sent was not reproduced in the conversation thread. Rather, I believe that this image (“IMG\_0739\_1.PNG”) was the one sent in this text message based on the content, context and the fact that this image was the most recent image captured on DAVILA’s iPhone prior to an image being sent to FELIBERTY. Additionally, as observable in the image, the screen capture reveals a “4:18” time in the phone, and the photo was sent at 4:18 PM.

12/15/2022 4:20:02 PM <sup>33</sup>	DAVILA	
12/15/2022 4:20:10 PM	DAVILA	That's ya list
12/15/2022 4:20:31 PM	OYOLA	👍👍

379. Investigators identified a text message conversation between FELIBERTY (utilizing TARGET PHONE 5) and OYOLA (utilizing TARGET PHONE 9) relating to the trailer theft and snowblower theft. In those messages, FELIBERTY and OYOLA coordinate meeting up at about 9:47 PM on December 13, 2022, prior to heading out to commit the thefts.

Date/Time	Author	Content
12/13/2022 9:14:58 PM	FELIBERTY	Yooo you ready
12/13/2022 9:15:40 PM	OYOLA	Yessir
12/13/2022 9:16:29 PM	FELIBERTY	I'm getting dressed now
12/13/2022 9:17:58 PM	OYOLA	Ok cool
12/13/2022 9:47:50 PM	FELIBERTY	Hurrrr
12/13/2022 9:52:11 PM	OYOLA	Ok cool

<sup>33</sup> Due to the manner of how the text messages were acquired, the image that was sent was not reproduced in the conversation thread. Rather, I believe that this image ("IMG\_0739\_1.PNG") was the one sent in this text message based on the content, context and the fact that this image was the most recent image captured on DAVILA's iPhone prior to an image being sent to OYOLA. Additionally, as observable in the image, the screen capture reveals a "4:18" time in the phone, and the photo was sent at 4:20 PM.

2. *Historical CSLI*

380. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized a cell tower in Acton, MA from 1:10 AM to 1:36 AM on December 13, 2022, which is the night before the thefts. This cell tower is located less than 1000 feet from the location of the theft in Acton, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the location of the theft in Acton, MA.
- b. TARGET PHONE 1 utilized cell towers in the area of Hooksett NH from 2:32 AM to 2:45 AM on December 14, 2022. The cell towers were within 3 miles from the location of the theft in Hooksett, NH. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the location of the trailer theft in Hooksett, NH.
- c. From 2:45 AM to 3:09 AM, TARGET PHONE 1 utilized cell towers consistent with travel to Massachusetts via I-93. TARGET PHONE 1 utilized a cell tower in Andover, MA at 3:09 AM on December 14, 2022.
- d. TARGET PHONE 1 utilized a cell tower in Acton, MA at 4:13 AM, 4:14 AM, 4:15 AM, and 4:16 AM on December 14, 2022. This cell tower is located less than 1000 feet from the location of the snowblower thefts in Acton, MA.

381. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 5 utilized by Santo FELIBERTY relative to the incidents.

- a. TARGET PHONE 5 utilized a cell tower in Acton, MA at 1:13 AM and 1:14 AM on December 13, 2022, which is the night before the theft. This cell tower is located less than 1000 feet from the location of the theft in Acton, MA. Network location data for TARGET PHONE 5 placed it in the immediate vicinity of the location of the theft in Acton, MA.
- b. TARGET PHONE 5 utilized a cell tower in Springfield, MA at 10:25 PM on December 13, 2022. Following this, TARGET PHONE 5 is conspicuously off the network and registers no network activity until 6:46 AM on December 14, 2022, when it utilized a cell tower in Holyoke, MA.

382. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 10 utilized by Santo FELIBERTY relative to the incidents.

- a. TARGET PHONE 10 utilized a cell tower in the area of Hooksett NH from 2:32 AM to 2:45 AM on December 14, 2022. The cell tower was within 1 mile from the location of the theft in Hooksett, NH. Network location data for TARGET PHONE 10 placed it in the immediate vicinity of the location of the trailer theft in Hooksett, NH.

- b. From 2:45 AM to 3:07 AM, TARGET PHONE 10 utilized cell towers consistent with travel to Massachusetts via I-93. TARGET PHONE 10 utilized a cell tower in Methuen, MA at 3:07 AM on December 14, 2022.
- c. TARGET PHONE 10 utilized a cell tower in Acton, MA at 3:42 AM, 3:44 AM on December 14, 2022. This cell tower is located less than 1000 feet from the location of the theft in Acton, MA. Network location data for TARGET PHONE 10 placed it in the immediate vicinity of the location of the snowblower thefts in Acton, MA.

383. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 9 utilized by Alex OYOLA relative to the incidents.

- a. TARGET PHONE 9 utilized a cell tower in Palmer, MA at 10:52 PM on December 13, 2022. Following this, TARGET PHONE 9 is conspicuously off the network and registers no network activity until 7:17 AM on December 14, 2022, when it utilized a cell tower in Springfield, MA.

**B. 2/2/2023, Northborough, MA, Burglary and Theft of Tools**

384. According to Northborough Police Report 2300001496, Northborough Police received reports of a burglary and motor vehicle theft at a storage facility. Based upon the report, multiple storage units were broken into and had the locks cut. One of the victims was an employee of Milwaukee tools. Approximately \$12,695 worth of Milwaukee tools and merchandise were stolen from the storage unit. Additionally, the victim reported that his work van was stolen and that it had a GPS tracking device in it. Furthermore, wheels were stolen from a Dodge Challenger that was also parked at the facility. The stolen work van was tracked via the GPS device and located in West Springfield, Massachusetts.

385. Northborough Police recovered surveillance video from the storage facility and identified an Acura MDX being involved in the thefts from approximately 12:40 AM to 2:00 AM. This vehicle matches the description of the MAROON ACURA MDX. Still images from the surveillance video recovered by Northborough Police follow:



386. Northborough Police obtained a list of Milwaukee items stolen from the storage unit. That list follows:

QTY	ITEM#	DESCRIPTION	RETAIL	EXT RETAIL
1	48-22-8426	(2) PACKOUT ROLLING TOOLBOX	\$139.00	\$139.00
2	48-22-8425	PACKOUTLARGETOOLBOX	\$89.97	\$179.94
1	48-22-8429	PACKOUTXLTOOLBOX	\$119.00	\$119.00
2	2722-20	M18 FUEL SUPER SAWZALL BARE	\$249.00	\$498.00
1	2821-20	GEN II M18 FUEL SAWZALL (BARE)	\$199.00	\$199.00
1	3697-22	M18 FUEL 2PC COMBO KIT HD/ID	\$399.00	\$399.00
2	48-11-1880	M18 HIGH OUTPUT XC8.0 BATTERY	\$199.00	\$398.00
1	2505-22	M12 FUEL INSTALLATION DRILL ORV KIT	\$229.00	\$229.00
1	2448-21	M12 CABLE STAPLER KIT	\$299.00	\$299.00
1	2836-20	M18 FUEL MULTI TOOL	\$229.00	\$229.00
1	2723-20	M18 FUEL COMPACT ROUTER	\$199.00	\$199.00
1	2829-20	M18 FUEL COMPACT BANDSAW	\$329.00	\$329.00
1	2429-21XC	M12 BAND SAW KIT	\$269.00	\$269.00
1	2729-20	M18 FUEL BAND SAW - BARE	\$379.00	\$379.00
1	2880-20	M18 FUEL 5" PADDLE BARE	\$199.00	\$199.00
1	2118-21	RLUSB BOLT HARD HAT HEADLAMP	\$89.97	\$89.97
3	48-11-1850	M18 XC5.0 BATTERY	\$159.00	\$477.00
1	2737-20	M18 FUEL D-HANDLE JIG-SAW (BARE)	\$199.00	\$199.00
1	2719-20	M18 FUEL HACKZALL (BARE)	\$169.00	\$169.00
1	0970-20	M18 FUEL PACKOUT 2.5 GAL WET/DRY VAC	\$199.00	\$199.00
1	2532-20	M12 FUEL PROPEX EXPANDER TL W/HD	\$529.99	\$529.99
1	2767-20	GEN II HTIW 1/2" RING BARE	\$279.00	\$279.00
1	2962-20	M18 FUEL 1/2" MTIW RING BARE	\$249.00	\$249.00
1	2854-20	M18 FUEL 3/8" CPIW RING BARE	\$219.00	\$219.00
1	2960-20	M18 FUEL 3/8" MTIW RING BARE	\$249.00	\$249.00
4	2821-20	GEN II M18 FUEL SAWZALL (BARE)	\$199.00	\$796.00
4	2836-20	M18 FUEL MULTI TOOL	\$229.00	\$916.00
2	3697-22	M18 FUEL 2PC COMBO KIT HD/ID	\$399.00	\$798.00
2	2732-20	M18 FUEL 7-1/4" CIRC SAW BARE	\$249.00	\$498.00
6	48-11-1865	M18 HIGH OUTPUT XC6.0 BATTERY	\$179.00	\$1,074.00
35	Mwt129	Milwaukee logo Titleist Pro golf balls	\$54.00	\$1,890.00
			<b>TOTAL</b>	<b>\$12,695.90</b>

387. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and MARSHALL (utilizing TARGET PHONE 7) on February 1, 2023, and February 2, 2023. In the text messages, DAVILA and MARSHALL coordinate meeting up prior to the burglary on February 1, 2023, and then also communicate after the burglaries. Pertinent text messages follow:

Date/Time	Author	Content
2/1/2023 4:37:50 PM	MARSHALL	Ok grabbing those things then be over there
2/1/2023 10:47:38 PM	DAVILA	10 min away
2/1/2023 10:48:52 PM	MARSHALL	Ok
2/1/2023 10:57:52 PM	DAVILA	I'm in the automatic wash up the street then I'll be right there
2/1/2023 11:01:22 PM	MARSHALL	Ok
2/1/2023 11:06:52 PM	DAVILA	Here
2/2/2023 11:31:35 AM	MARSHALL	You good bro ?
2/2/2023 11:31:50 AM	DAVILA	Yessir
2/2/2023 11:31:59 AM	DAVILA	In the way to my barber
2/2/2023 11:33:03 AM	MARSHALL	Oh ok bro
2/2/2023 11:33:43 AM	DAVILA	I'll hit you up in a few Brody
2/2/2023 11:41:19 AM	MARSHALL	Ok

388. The stolen van was tracked using the GPS device located inside the van to 203 Circuit Avenue, West Springfield. Investigators reviewed the historical GPS information for the MAROON ACURA MDX, which showed that the MAROON ACURA MDX was at 203 Circuit Avenue, West Springfield 4:30 AM for 10 minutes, then left the area and travelled to DAVILA's residence in Feeding Hills, MA.

389. Investigators obtained records from Home Depot. Review of those records revealed that on February 2, 2023, at 3:38 PM, DAVILA and MARSHALL purchased six (6) 27-gallon storage totes for \$76.27 at a Home Depot located in West Springfield, MA. Of note, DAVILA can be seen wearing black a black Adidas hat. After the purchase, surveillance video showed that DAVILA and MARSHALL exited the store and entered a black Suburban and departed the area. A still image of MARSHALL (left) and DAVILA exiting the Home Depot after the purchase follows:




390. Investigators reviewed text messages between DAVILA (utilizing TARGET PHONE 1) and an individual whose identity is known to me, whom I will refer to as coconspirator-two (“CC-2”). In the text message conversation, DAVILA sends CC-2 a text message that lists the Milwaukee tool item numbers and retail price. CC-2 is an individual known to me who, according to the evidence developed in this case, is an individual who resides in Connecticut that is involved in the resale of stolen property. The item numbers sent by DAVILA to CC-2 match those stolen from the storage unit. The text messages then indicate that DAVILA travels to CC-2, who I know to operate a warehouse in Connecticut. The pertinent text messages follow:

Date	Author	Content
2/2/2023 7:32:46 PM	DAVILA	<p>Milwaukee inventory 2845-20 carry on power supply display msrp \$700</p> <p>Mxf501-1cp sewer drum machine new Msrp \$3000</p> <p>MLXP712 expandable level new Msrp \$270</p> <p>2736-20 fuel table saw display Msrp \$450</p> <p>2131-20 dual power tower light new Msrp \$230</p> <p>2365-20 mounting flood new MSRP \$120</p> <p>2146-20 LED compact sight light Msrp \$350</p>

	2820-20 concrete sprayer display missing attachments msrp \$300
	2504-20 drill display Msrp \$150
	2553-20 mini impact display Msrp \$130
	5387-20 1/2 hammer drill display Msrp \$240
	2767-20 1/2 fuel impact display Msrp \$330
	2862-20 1/2 fuel impact one key display Msrp \$320
	2473-20 press tool display Msrp \$1700
	2836-20 oscillating multi tool display Msrp \$230
	2773-20 force logic press tool display Msrp \$2740
	2679-20 600 mcm crimper display Msrp \$2800
	2916-20 sds rotary hammer display Msrp \$500
	2980-20 fuel grinder display Msrp \$280
	2888-20 fuel grinder display Msrp \$280
	2737-20 jig saw display Msrp \$200
	2915-DE hammervac dedicated dust extractor display Msrp \$180
	2912-DE rotary hammer with hammervac display MSRP \$500
	2745-20 framing nailer display Msrp \$380
	2841-20 finish nailer display Msrp \$330
	2829-20 compact band saw display Msrp \$330

	2429-20 band saw display Msrp \$200
	2629-20 band saw display Msrp \$250
	2729s-20 large band saw display Msrp \$420
	2529-20 small band saw w battery display Msrp \$260
	2720-20 sawzall display Msrp \$260
	2722-20 sawzall display Msrp \$260
	3622-29 cross line and plumb points laser Display Msrp \$400
	(2) 2982-20 fuel metal cutting circular saws display Msrp \$430 w battery
	2471-20 copper tubing cutter display Msrp \$200
	2635-20 double cut shear display Msrp \$270
	(4) 2719-20 hackzall new Msrp \$170
	(4) 2821-20 sawzall new Msrp \$200
	(4) 2835-20 oscillating multi tools new Msrp \$230
	(2) 0420-20 plug in drills new Msrp \$100
	2886-20 fuel grinder new Msrp \$310
	6141-30 plug in grinder new Msrp \$100
	2625-20 hackzall new \$210
	(2) 2626-20 m18 multi tool new Msrp \$140
	2531-20 orbital detail sander new

		<p>Msrp \$150</p> <p>(2) 48-53-2840 head attachment kit new Msrp \$430</p> <p>(3) 48-53-3840 head attachment kit new Msrp \$430</p> <p>3522-21 laser usb cross line and plumb points laser new Msrp \$380</p> <p>2749-20 narrow crown stapler new Msrp \$300</p> <p>2732-20 circular saw new Msrp \$250</p> <p>49-16-bkita bushing kit new Msrp \$350</p> <p>49-16-kitc mcm copper u-style dye kit new Msrp \$850</p> <p>3697-22 drill and impact drill combo kit Msrp \$400</p> <p>2808-20 fuel hole Hawg right angle drill with battery, bag and charger new Msrp \$500</p> <p>2691-22 drill and impact combo kit new Msrp \$200</p> <p>49-66-6805 metric and sae socket set new Msrp \$200</p> <p>48-44-5195 angler interchangeable fish tape system new Msrp \$100</p> <p>(2) 5387-20 plug in 1/2 inch hammer drill new Msrp \$240</p> <p>49-56-9280 hole saw kit new Msrp \$140</p> <p>49-22-0065 plumber selffeed bit set new Msrp \$230</p> <p>3632-21 laser green 360 3 plain laser kit new Msrp \$600</p> <p>2532-20 propex expander tool new Msrp \$530</p>
2/2/2023 7:34:01 PM	CC-2	Got it
2/2/2023 7:50:15 PM	CC-2	Call me when you can

2/2/2023 7:50:35 PM	CC-2	I'm doing the math now. I have a question
2/2/2023 8:25:43 PM	DAVILA <sup>34</sup>	
2/2/2023 8:26:16 PM	DAVILA	
2/2/2023 9:10:35 PM	CC-2	
2/2/2023 9:15:06 PM	DAVILA	
2/2/2023 9:20:01 PM	CC-2	
		That's the big shit all top of the list
		Nice
		I'm 15-20 minutes away
		Ok

391. Of note, at 8:25 PM, DAVILA sent CC-2 a photograph of Milwaukee tools that appear new in box, that match items stolen on February 2, 2023, from the storage unit.

392. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 1 utilized by Rafael DAVILA relative to the incidents.

- a. TARGET PHONE 1 utilized cell towers in Northborough, MA from approximately 12:20 AM to 2:09 AM on February 2, 2023. The cell towers were within 2 miles from a the location of the thefts. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the thefts.
- b. TARGET PHONE 1 utilized a cell tower in Feeding Hills, MA at 4:55 AM on February 2, 2023. The cell tower is within 1.25 miles from DAVILA's residence in Feeding Hills, MA. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the location of DAVILA's residence.
- c. TARGET PHONE 1 utilized a cell tower in Feeding Hills, MA from 7:49 PM to 8:09 PM on February 2, 2023.

<sup>34</sup> Due to the manner of how the text messages were acquired, the image that was sent was not reproduced in the conversation thread. Rather, I believe that this image ("IMG\_1085\_2.HEIC") was the one sent in this text message based on the content, context and the fact that this image was the most recent image captured on DAVILA's iPhone prior to an image being sent to CC-2.

- d. TARGET PHONE 1 utilized a cell tower in Windsor, CT from 9:39 PM on February 2, 2023, to 1:45 AM on February 3, 2023. The cell tower is within 3000 feet from a warehouse known to be used by CC-2. Engineering data for TARGET PHONE 1 placed it in the immediate vicinity of the locations of the warehouse in Windsor, CT used by CC-2.

393. Investigators conducted a preliminary review of historical CSLI for TARGET PHONE 7 utilized by Zachary MARSHALL relative to the incidents.


- a. TARGET PHONE 7 utilized cell towers in Northborough, MA from approximately 12:34 AM to 2:08 AM on February 2, 2023. The cell towers were within 2 miles from a the location of the thefts. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the locations of the thefts.
- b. TARGET PHONE 7 utilized a cell tower in Feeding Hills, MA at 4:57 AM on February 2, 2023. The cell tower is within 1.25 miles from DAVILA's residence in Feeding Hills, MA. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the locations of DAVILA's residence.
- c. TARGET PHONE 7 utilized cell towers in Northborough, MA from approximately 12:34 AM to 2:08 AM on February 2, 2023. The cell towers were within 2 miles from the location of the thefts. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the locations of the thefts.
- d. TARGET PHONE 7 utilized a cell tower in Feeding Hills, MA from 8:02 PM to 8:57 PM on February 2, 2023.
- e. TARGET PHONE 7 utilized a cell tower in Windsor, CT from 9:34 PM on February 2, 2023 to 1:45 AM on February 3, 2023. The cell tower is within 3000 feet from a warehouse known to be used by CC-2. Engineering data for TARGET PHONE 7 placed it in the immediate vicinity of the locations of the warehouse in Windsor, CT used by CC-2.

394. On February 16, 2023, MARSHALL was driving an Infiniti and was subsequently pulled over by the Massachusetts State Police for having an improper registration on his vehicle. During the stop the Trooper made the determination that the car needed to be towed. Before towing the vehicle, the Trooper conducted an inventory search of the items in the car. Among the items noted during the inventory search were a Milwaukee impact driver and impact wrench. The Milwaukee impact driver and impact wrench resemble the items that were stolen on February 2, 2023. Among the item stolen was a 3697-22 M18 FUEL 2PC COMBO KIT HD/ID that would contain an impact driver and impact hammer drill.

**X. CONCLUSION**

395. Based the foregoing, there is probable cause to believe that (1) RAFAEL DAVILA, (2) JOSE TORRES, (3) NICOLAS DAVILA, (4) CARLOS FONSECA, (5) ZACHARY MARSHALL, (6) SANTO FELIBERTY, and (7) ALEXANDER OYOLA, have committed the following violations of federal law: Count One, Conspiracy to Transport Stolen Property Valued Over \$5,000 in Interstate Commerce, in violation of 18 U.S.C. § 371; Count Two, Interstate Transportation of Stolen Property Valued Over \$5,000, in violation of 18 U.S.C. § 2314; Count Three, Conspiracy to Steal More than \$1,000 from a Federally Insured Bank, in violation of 18 U.S.C. § 371; Count Four, Theft of More than \$1,000 from a Federally Insured Bank, in violation of 18 U.S.C. § 2113(b); and Count Five, Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h).

Sworn under the penalties of perjury to via telephone in accordance with Federal Rule of Criminal Procedure 4.1 on **Apr 6, 2023**.

  
\_\_\_\_\_  
Christopher Ryan  
Taskforce Officer  
Federal Bureau of Investigation

Sworn to telephonically in accordance with Federal Rule of Criminal Procedure 4.1 on **Apr 6, 2023**.

  
\_\_\_\_\_  
HON. JUDITH G. DEIN  
UNITED STATES MAGISTRATE JUDGE

## APPENDIX A

Pertinent Text Messages between Rafael DAVILA (utilizing TARGET PHONE 1)  
and Zachary MARSHALL (utilizing TARGET PHONE 7)


Date	Author	Content
11/11/2022 1:54:34 AM	MARSHALL	Yo it Zack
11/11/2022 8:07:28 PM	MARSHALL	I got the regulars 4 46s and 1 ford we can check the number if you want when you see them
11/11/2022 8:10:38 PM	DAVILA	Ok that's cool. I'll give you \$1k
11/11/2022 8:11:28 PM	MARSHALL	They saying number went up to but we could figure all that out once you see what they paying I ain't worried about it
11/11/2022 8:30:07 PM	DAVILA	I was getting \$240 ea when the rhodium was at \$13,500 which is very low.
11/11/2022 8:30:42 PM	DAVILA	I promise you I'll be lucky to get \$225 for the 46's
11/11/2022 8:30:58 PM	DAVILA	I just wanna do a trial run
11/11/2022 8:32:17 PM	MARSHALL	Nah I believe you that's ya best bet though to see what they will pay you
11/11/2022 8:32:17 PM	DAVILA	I haven't been to that spot since last year and they don't use the same pricing system out last company so I'm a little nervous about buying and bringing too much.
11/11/2022 8:33:40 PM	DAVILA	I'm not gonna lie there were times that they would pay significantly more for certain pieces, but then other pieces would be like way less. In the beginning, I would call back-and-forth to compare pricing until I just gave up on it and started going to the same people as Goldy and even sometimes just giving them to Goldy so I don't have to take the trip.
11/11/2022 8:35:04 PM	DAVILA	Download the kitco app and watch the prices for yourself so you never get played.
11/11/2022 8:35:42 PM	DAVILA	You're watching the prices for platinum palladium and rhodium on the bid side.
11/11/2022 8:36:11 PM	MARSHALL	Yea I feel you I never go to them people cause I make my money regardless off them but if I know you buying them I rather just go through you and you make money off it I don't get alot all the time but some times I go in and get like 20 a night depending
11/11/2022 8:40:56 PM	DAVILA	Ok. I'm just a call or text away bro. We'll get the pricing figured out by tuesday
11/20/2022 9:17:40 AM	MARSHALL	What up did you cash those out to see what they paying ?
11/20/2022 9:18:02 AM	MARSHALL	I want get more but I don't want grab them if you don't want to buy them cause no one else buying right now
11/20/2022 11:38:01 AM	DAVILA	They want ID and to fill out paperwork so I'm waiting for my ID to come in then we should be good to go
11/20/2022 11:38:33 AM	DAVILA	I called one of the guys that works there and he gave me the scoop
11/20/2022 11:40:03 AM	MARSHALL	Ohh ok
12/12/2022 11:03:47 AM	DAVILA	Wtw bro
12/12/2022 11:04:10 AM	MARSHALL	You not buying non those or no anyone to buy a few of them
12/12/2022 11:04:41 AM	DAVILA	Rn it's like a week turn over
12/12/2022 11:05:06 AM	DAVILA	I can send your with my next batch tomorrow but we won't get paid for a few days
12/15/2022 11:47:16 AM	DAVILA	What up
12/15/2022 11:47:26 AM	MARSHALL	You talk to goldy still ?

12/15/2022 11:47:36 AM	DAVILA	Yea
12/15/2022 11:47:59 AM	MARSHALL	See how much he will give you for the codes slm Nissan
12/15/2022 11:48:57 AM	MARSHALL	I want see if him and my man's trying play me and if he says a higher price I'm start going to you to go to him and you can make that extra money if he say 600 or 550 you can make that extra 100 on them
12/15/2022 11:49:09 AM	DAVILA	Ok. I have to see him later so I'll ask him
12/15/2022 11:53:04 AM	MARSHALL	Ok lmk
12/18/2022 8:56:04 PM	MARSHALL	Yo you know about the Chevey vans that look like Nissan ones are those any good ?
12/19/2022 3:13:52 PM	MARSHALL	681436418r
12/19/2022 3:14:04 PM	MARSHALL	16A8b044
12/19/2022 4:27:41 PM	DAVILA	Send me pics of the codes. I looked them up all different ways and I can't find anything
12/19/2022 4:50:20 PM	MARSHALL	Did they show up
12/19/2022 4:50:38 PM	DAVILA	Not at all. I'm trying every combination
12/19/2022 4:50:53 PM	MARSHALL	This nigga saying 125 each lol
12/19/2022 4:51:07 PM	DAVILA	Bro they're not showing up
12/19/2022 4:53:22 PM	DAVILA	I found them on the old app but I stopped paying that subscription because the company got raided.
12/19/2022 4:53:46 PM	DAVILA	They look exactly like the ford round short
12/19/2022 5:03:44 PM	MARSHALL	Bro these niggas is lame lol I'm done fucking with them they always trying play someone talking bout 400 for them 3lm ones
12/19/2022 5:11:16 PM	MARSHALL	I rather just go to you and you make the extra money off me fuck them
12/19/2022 5:15:19 PM	DAVILA	It's just like a day turn around.
12/19/2022 5:15:19 PM	DAVILA	I'm getting \$575 for the 3LM now.
12/29/2022 7:57:50 PM	MARSHALL	Yo they buying the 46 and 45 again and the fords?
12/29/2022 8:00:17 PM	DAVILA	Its the same situation bro
12/29/2022 8:01:04 PM	MARSHALL	They said goldy buying them again so maybe it changed
12/29/2022 8:04:06 PM	DAVILA	Oh ok. He always was but just paying real cheap because he's just cutting the them open and selling the insides by the pound so it's a lot less now.
12/29/2022 8:05:10 PM	DAVILA	And the turn around is like a week
12/29/2022 8:05:56 PM	MARSHALL	Oh ok I just didn't want grab some and can't sell
12/29/2022 8:07:25 PM	DAVILA	He'll buy them brody just paying less but I get it because it's by the pound now
1/4/2023 9:17:35 AM	MARSHALL	Yo I got like 3 of those 3lm
1/4/2023 11:54:51 AM	DAVILA	Ok I have a couple pieces I have to bring too. I'll hit you up in a few so I can pick those up
1/4/2023 11:55:22 AM	MARSHALL	What number they goin for right now to ?
1/4/2023 11:55:52 AM	DAVILA	Idk I haven't brought any in weeks
1/4/2023 11:57:50 AM	DAVILA	Last time I brought one of those was in mid December and it was \$575
1/4/2023 11:58:30 AM	MARSHALL	They might went up I seen the app you showed me and it's higher than it was then so hopefully they higher
1/4/2023 12:49:57 PM	DAVILA	No they didn't. The rhodium was 12,600, plat was 1050 and palladium was 2100 in mid December
1/4/2023 12:50:51 PM	MARSHALL	Oh yea in December I'm talking about for like these last 2 weeks
1/4/2023 12:51:21 PM	DAVILA	The last time I scrapped one of those was dec 14th
1/4/2023 12:52:25 PM	DAVILA	Click on that last screen shot, it says the date I made that note

1/4/2023 12:53:12 PM	DAVILA	Trust me with these dudes. They're quick to drop the prices when the market falls but cry about raising it when the market goes back up
1/4/2023 12:53:34 PM	MARSHALL	Nah I believe you bro I was just saying like that shit went up the last week since I seen it I don't remember for what it was at in December but when you going to go up there
1/4/2023 12:55:28 PM	DAVILA	I got you brody. I'm gonna drop some off in a couple hours. Just taking care of a few things
1/26/2023 8:49:08 PM	DAVILA	5 RE8-RE9 Toyota sticks 1 honda accord 60/40 1 Honda accord 50/50 1 Honda odyssey slant 1 pri rear EA6 1 Nissan 3LM stick 1 Toyota ND8-ND4 stick 1 Toyota GK6-GK5 stick 1 Hyundai JSH62
1/26/2023 8:52:42 PM	DAVILA	Damn I dropped them off this morning 😞
1/26/2023 9:19:49 PM	MARSHALL	I'm down to go out still though it's still money in the bank regardless I'm sure we figure out to sell them quick
1/28/2023 8:17:02 AM	MARSHALL	Yo call me
1/28/2023 8:18:05 AM	MARSHALL	They buying flat face ones 250 each out there he bout to check all those codes now for me
2/1/2023 4:37:50 PM	MARSHALL	Ok grabbing those things then be over there
2/1/2023 10:47:38 PM	DAVILA	10 min away
2/3/2023 10:09:13 AM	DAVILA	About the same as over here. A little less actually
2/7/2023 8:47:48 PM	MARSHALL	You already know bro
2/8/2023 8:26:58 AM	MARSHALL	Send me the whole list of the codes so I can send to my man's in Florida just all the codes


**APPENDIX B**

Pertinent Text Messages between Rafael DAVILA (utilizing TARGET PHONE 1)  
and JOSE TORRES (UTILIZING TARGET PHONE 3)


Date / Time	Author	Body
2/7/2022 12:42:43 PM	TORRES	Goldy
3/1/2022 10:31:26 AM	TORRES	Prices up a lil more
3/1/2022 11:32:31 AM	DAVILA	I have a bunch
3/1/2022 11:33:01 AM	DAVILA	They're working on my bathroom. When they're done I'll come see you.
3/1/2022 3:59:00 PM	DAVILA	8 min away
3/1/2022 4:05:36 PM	DAVILA	Here
3/3/2022 3:21:17 PM	TORRES	On my way home
3/3/2022 3:21:49 PM	DAVILA	Ok I'm 10 min away
3/3/2022 4:07:59 PM	DAVILA	

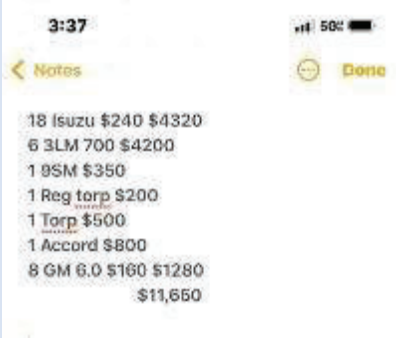
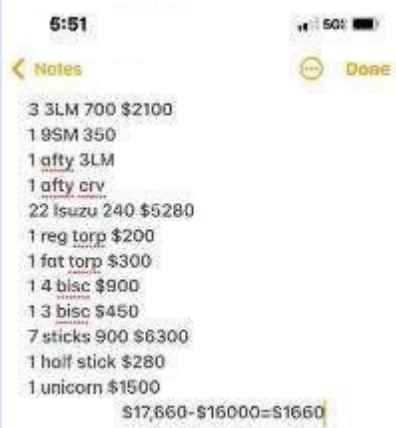

3/3/2022 4:27:25 PM	DAVILA	
3/4/2022 1:22:50 PM	TORRES	Those Honda accord's can do 1000 from now on
3/4/2022 1:25:35 PM	DAVILA	Oh it's lit
3/11/2022 2:01:12 PM	DAVILA	10 3LM Nissan sticks 4 9SM Nissan sticks
3/11/2022 2:11:49 PM	DAVILA	


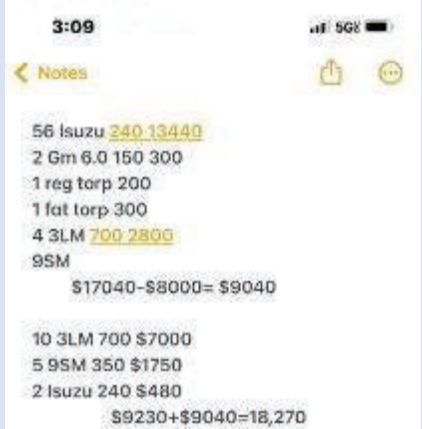
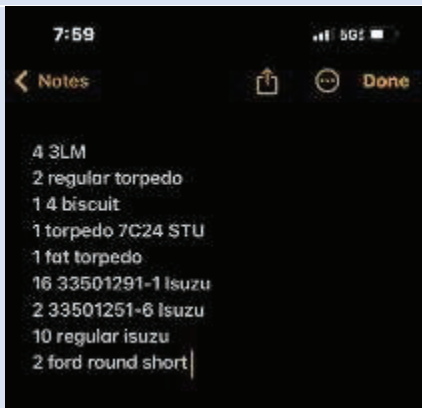
3/11/2022 2:11:50 PM	DAVILA		
3/11/2022 2:15:45 PM	DAVILA		
3/14/2022 2:42:23 PM	TORRES	That 3 biscuit blown 🤔🤔	
3/14/2022 2:42:48 PM	DAVILA	Wym?	
3/14/2022 2:44:04 PM	TORRES	It only got one biscuit good	
3/14/2022 2:44:42 PM	DAVILA	Oh shit. Ok don't worry we'll make it up	
3/14/2022 2:44:57 PM	DAVILA	I didn't look in it	
3/15/2022 2:37:40 PM	DAVILA		
3/15/2022 2:38:11 PM	DAVILA	4 3LM sticks 2 9SM sticks 1 Hyundai 3C710 1 Nissan zx1ke 1 accord large	
3/15/2022 7:13:03 PM	DAVILA	How we lookin for time?	
3/15/2022 7:13:30 PM	TORRES	Hour	
3/15/2022 7:13:39 PM	DAVILA	Aight coo	
3/15/2022 8:03:18 PM	DAVILA	I just pulled up. Ima back in the driveway	
3/19/2022 8:42:52 PM	DAVILA	I'm about to send that. Making a stop then going to the atm	
3/19/2022 9:43:35 PM	TORRES	Just landed	

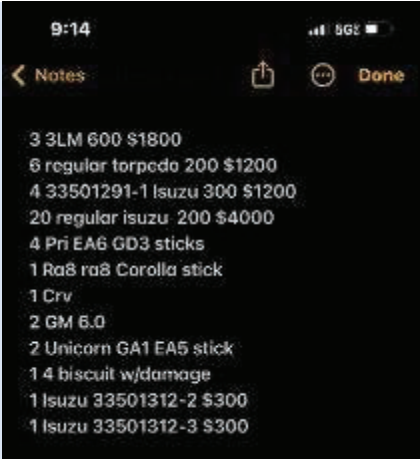
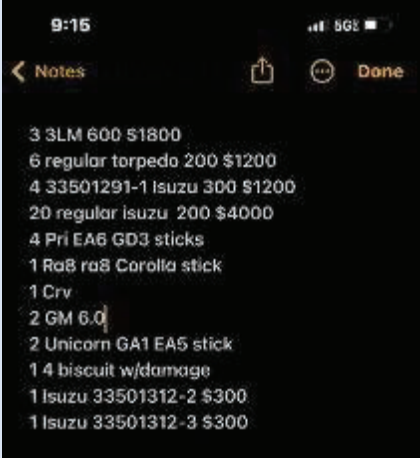

3/19/2022 9:46:04 PM	DAVILA	I sent that
3/19/2022 9:49:09 PM	DAVILA	Want me to get it now? I can wait till tomorrow up to you
3/19/2022 9:49:30 PM	TORRES	Wend ever it's home
3/19/2022 9:49:49 PM	DAVILA	Ok ima go now. I'm on maple so I'll be there quick
4/14/2022 4:59:36 PM	DAVILA	I got some pieces lmk when you ready for me
4/14/2022 5:05:04 PM	TORRES	Iam home
4/14/2022 5:07:33 PM	DAVILA	Ok ima head your way in a few minutes
4/14/2022 5:31:49 PM	DAVILA	I'm like 8 min away
4/14/2022 5:43:39 PM	DAVILA	I'm here
4/19/2022 3:43:56 PM	DAVILA	Yo you home?
4/19/2022 3:47:25 PM	TORRES	Yea
4/19/2022 4:09:49 PM	DAVILA	I'm here
4/19/2022 9:36:22 PM	DAVILA	Here
4/19/2022 9:36:32 PM	TORRES	In the garage
4/26/2022 9:00:16 PM	TORRES	Come tru
4/26/2022 9:02:42 PM	DAVILA	I'll pass by tomorrow
4/27/2022 1:10:58 PM	DAVILA	I'll see you after. Just hit me up when you get out. I had to make a stop.
4/27/2022 2:04:56 PM	TORRES	On my way home
4/27/2022 2:08:03 PM	DAVILA	Ok
4/27/2022 5:50:29 PM	DAVILA	You at the crib? I'm in the south end. I can pass by now
4/27/2022 5:50:40 PM	TORRES	Yea
4/27/2022 6:03:39 PM	DAVILA	Here
5/6/2022 1:42:37 PM	DAVILA	Call me when you get a chance
5/11/2022 7:07:38 PM	TORRES	


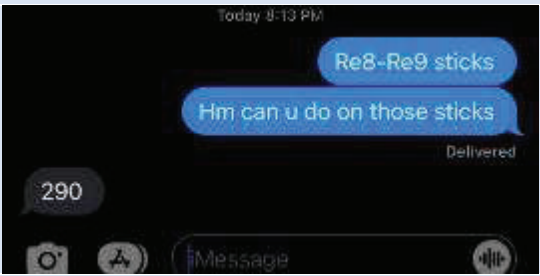
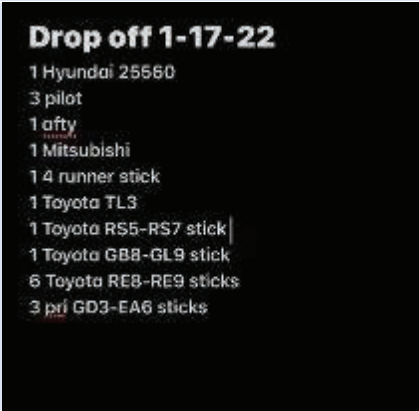
5/12/2022 4:49:09 PM	DAVILA	
7/1/2022 3:53:01 PM	DAVILA	How much? Crv
7/1/2022 5:35:33 PM	TORRES	200
7/1/2022 5:49:27 PM	DAVILA	Ok one of my boys got it. I'll get it from him tomorrow and drop it off to you
7/14/2022 11:39:22 AM	DAVILA	Yoo how much can you pay for the sticks rn
7/14/2022 12:15:44 PM	TORRES	What sticks
7/26/2022 1:50:37 PM	DAVILA	I'm here
7/28/2022 3:00:07 PM	DAVILA	
7/29/2022 7:02:06 PM	DAVILA	Yo you busy?
7/30/2022 12:46:16 PM	DAVILA	Yoo I just pulled up
7/30/2022 4:54:44 PM	DAVILA	Wya
8/9/2022 8:16:58 PM	DAVILA	I'm almost at your house
8/9/2022 8:17:29 PM	TORRES	Iam bring a load up tomorrow
8/9/2022 8:19:48 PM	DAVILA	I'll see you tomorrow with what I have. I left your bud and a pack of games in the Center console of your sea doo
8/9/2022 8:25:57 PM	TORRES	K thanks
8/9/2022 8:29:14 PM	DAVILA	Np bro


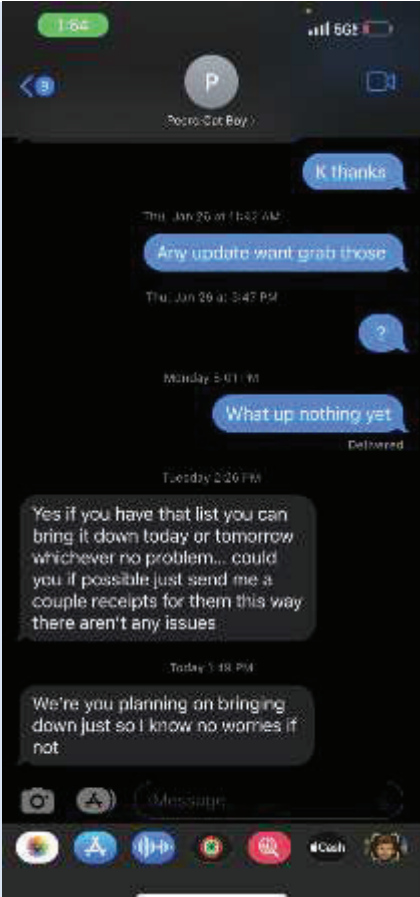
8/16/2022 3:20:15 PM	DAVILA	<p>3:10</p> <p>Notes</p> <p>17 Isuzu 240 4080  3 regular torp 200 600  3 Gm 160 480  6 3LM 700 4200  9 fat torp 300 2700</p> <p>12,060-3000=\$9060</p>
8/16/2022 4:09:23 PM	DAVILA	<p>6 Isuzu 240 \$1440  1 reg torp \$200  1 3LM \$700  1 9SM \$450  =\$2790</p> 
8/16/2022 5:17:26 PM	TORRES	Ad \$10 to the zuzu they goin to give me them
8/16/2022 5:19:33 PM	DAVILA	Well leave it like that this round. We'll go back up next round
8/17/2022 4:37:19 PM	DAVILA	<p>4:37</p> <p>Notes</p> <p>17 Isuzu 240 4080  3 regular torp 200 600  3 Gm 160 480  6 3LM 700 4200  9 fat torp 300 2700</p> <p>12,060-3000=\$9060-4000=\$5060</p> <p>6 Isuzu 240 1440  1 3LM 700  1 9SM 450  1 reg torp 200  =\$2790-\$2000= 790</p> <p>36 Isuzu 240 \$8640</p>
8/23/2022 2:19:00 PM	DAVILA	Yooo
8/23/2022 5:31:40 PM	DAVILA	I'm here
8/23/2022 5:33:17 PM	TORRES	On my way had stop at uhal

8/23/2022 5:45:27 PM	DAVILA	Ok
9/6/2022 3:38:16 PM	DAVILA	 <p>3:37 50%        &lt; Notes Done        18 Isuzu \$240 \$4320        6 3LM 700 \$4200        1 9SM \$350        1 Reg torp \$200        1 Torp \$500        1 Accord \$800        8 GM 6.0 \$160 \$1280        \$11,660</p>
9/7/2022 9:12:01 PM	DAVILA	I'll just see you tomorrow after I get a haircut like around 1:45 if that's cool
9/7/2022 9:13:03 PM	TORRES	K
9/13/2022 5:52:05 PM	DAVILA	 <p>5:51 50%        &lt; Notes Done        3 3LM 700 \$2100        1 9SM 350        1 afly 3LM        1 afly crv        22 Isuzu 240 \$5280        1 reg torp \$200        1 fat torp \$300        1 4 bisc \$900        1 3 bisc \$450        7 sticks 900 \$6300        1 half stick \$280        1 unicorn \$1500        \$17,660-\$16000=\$1660</p>
9/13/2022 5:58:12 PM	DAVILA	Plus two Isuzu with cables
9/15/2022 5:13:45 PM	DAVILA	 <p>5:12 5G        &lt; Notes        3 3LM 700 \$2100        1 9SM 350        1 afly 3LM        1 afly crv        22 Isuzu 240 \$5280        1 reg torp \$200        1 fat torp \$300        1 4 bisc \$900        1 3 bisc \$450        7 sticks 900 \$6300        1 half stick \$280        1 unicorn \$1500        \$17,660-\$16000=\$1660+480=\$2140        4 3LM 700 \$2800        2 9SM 350 \$700        7 Isuzu 240 \$1680        3 Reg torp 200 \$600        1 fat torp \$300        3 pri sticks 900 \$2700        1 half pri \$280        2 tundra sticks 250 \$500        2 ford Round 125 \$250 = \$9810        \$9810+\$2140=\$11950-\$10,000=\$1,950</p>

9/29/2022 11:30:59 AM	DAVILA	Yooo
10/3/2022 6:20:01 PM	DAVILA	
10/5/2022 3:09:13 PM	DAVILA	I just pulled up
10/5/2022 3:10:00 PM	DAVILA	
10/5/2022 3:10:05 PM	DAVILA	I'm here
10/7/2022 11:48:58 AM	DAVILA	Here
10/7/2022 2:03:04 PM	TORRES	On the way
10/7/2022 2:03:18 PM	DAVILA	Me too
11/28/2022 3:57:50 PM	DAVILA	I'm on the way
11/28/2022 4:30:38 PM	DAVILA	I'm here
11/28/2022 4:32:52 PM	TORRES	K
11/28/2022 7:59:19 PM	DAVILA	
11/29/2022 11:10:05 PM	DAVILA	I should be there in about 25 min
12/6/2022 8:29:17 PM	DAVILA	I'm here bro

12/6/2022 9:14:36 PM	DAVILA		
12/6/2022 9:15:55 PM	DAVILA		
12/8/2022 5:32:45 PM	DAVILA	Yoo wtw bro	
12/8/2022 5:35:19 PM	TORRES	On the way back	
12/8/2022 5:35:38 PM	DAVILA	Sweet	
12/23/2022 3:15:07 PM	DAVILA		
12/25/2022 12:57:55 PM	TORRES	Merry Christmas bro 🎄🎁	
1/4/2023 3:40:28 PM	DAVILA	Yoooo	

1/4/2023 3:56:19 PM	DAVILA	
1/9/2023 8:12:40 PM	DAVILA	Re8-Re9 sticks
1/9/2023 8:18:48 PM	TORRES	
1/9/2023 8:22:26 PM	DAVILA	Ok last time you gave me \$275 and I just gave him what you gave me on it. Just tryna make a little something fuck it. When you want me to grab them and bring them?
1/9/2023 8:27:50 PM	TORRES	Idk let me see if he wants em
1/9/2023 8:30:50 PM	DAVILA	Ok
1/17/2023 5:30:45 PM	DAVILA	Here
1/17/2023 6:14:34 PM	DAVILA	
1/18/2023 7:11:06 PM	DAVILA	I'm here
1/19/2023 9:08:31 PM	TORRES	Here
1/19/2023 9:19:10 PM	DAVILA	I'm on the way
1/20/2023 10:32:38 AM	DAVILA	I'm about to pull up
1/20/2023 10:33:12 AM	TORRES	K

1/20/2023 10:55:03 AM	DAVILA	 <p>10:54 5G</p> <p>&lt; Notes</p> <p><b>Drop of 1-20-23</b></p> <ul style="list-style-type: none"> <li>5 RE8-RE9 Toyota sticks</li> <li>1 honda accord 60/40</li> <li>1 Honda accord 50/50</li> <li>1 Honda odyssey slant</li> <li>1 pri rear EA6</li> <li>1 Nissan 3LM stick</li> <li>1 Toyota ND8-ND4 stick</li> <li>1 Toyota GK6-GK5 stick</li> <li>1 Hyundai JSH62</li> </ul> <p><b>Drop off 1-4-23</b></p> <ul style="list-style-type: none"> <li>4 fat torp</li> <li>3 reg torp</li> <li>6 Isuzu</li> </ul>	
2/2/2023 1:55:01 PM	TORRES	 <p>1:54 5G</p> <p>Petro-Cut Boy</p> <p>K thanks</p> <p>Thu, Jan 26 at 1:52 AM</p> <p>Any update want grab those</p> <p>Thu, Jan 26 at 3:47 PM</p> <p>?</p> <p>Monday 2:01 PM</p> <p>What up nothing yet</p> <p>Delivered</p> <p>Tuesday 2:26 PM</p> <p>Yes if you have that list you can bring it down today or tomorrow whichever no problem... could you if possible just send me a couple receipts for them this way there aren't any issues</p> <p>Today 3:18 PM</p> <p>We're you planning on bringing down just so I know no worries if not</p>	
2/3/2023 6:03:19 PM	DAVILA	I'm like 8-10 minutes away	

2/3/2023 6:15:53 PM	TORRES	<p><b>Drop of 1-20-23</b></p> <p>5 Red 2028 Toyota sticks</p> <p>1 Honda accord 50/50</p> <p><b>1 Honda accord 50/50</b></p> <p>1 Honda accord 50/50</p> <p>1 Ford rear EAG</p> <p>1 Ford rear 2018 stick</p> <p>1 Toyota NDB-ND4 stick</p> <p>1 Toyota GKE-GKE stick</p> <p>1 Hyundai JSH52</p> <p><b>Drop off 1-4-23</b></p> <p>4 fat torp</p> <p>3 reg torp</p> <p>6 Isuzu</p>	
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## APPENDIX C

Pertinent Text Messages between TORRES (utilizing TARGET PHONE 3)  
and Ishu Lakra (utilizing 9052 phone)

Date – Time	Author	Body
4/14/2022 6:44:37 PM	Lakra (9052)	What's up bro
4/14/2022 6:51:46 PM	Lakra (9052)	?
4/14/2022 6:52:40 PM	Lakra (9052)	Please send me the address brother
4/15/2022 11:58:12 AM	Lakra (9052)	Hey brother how many cats you have for me tomorrow Number of cats ?
4/15/2022 1:52:14 PM	Lakra (9052)	Bro please answer me if you don't want me to come its fine No need to sell to me
4/15/2022 1:52:18 PM	Lakra (9052)	But just let me know
4/15/2022 1:52:29 PM	Lakra (9052)	Atleast answer
4/19/2022 5:19:24 PM	TORRES	74 Knox st Springfield mass 01108
4/19/2022 5:21:54 PM	Lakra (9052)	Will confirm you in 15 min bro
4/19/2022 5:22:24 PM	TORRES	K
4/19/2022 6:02:15 PM	Lakra (9052)	On my way bro 9:50 eta
4/19/2022 6:02:49 PM	Lakra (9052)	Ok ?
4/19/2022 6:03:00 PM	TORRES	Ok
4/19/2022 9:45:43 PM	TORRES	What's the Eta
4/19/2022 9:46:06 PM	Lakra (9052)	Will be there at 10:22
4/19/2022 9:46:19 PM	Lakra (9052)	It was little traffic
4/19/2022 9:47:10 PM	Lakra (9052)	According to gps 10:22 I'll be there
4/19/2022 10:05:06 PM	TORRES	K
4/19/2022 10:19:13 PM	Lakra (9052)	I am here Outside
4/25/2022 7:37:05 PM	Lakra (9052)	Bro I'll be there tomorrow at around 7:30 to 8 pm
4/25/2022 7:42:12 PM	TORRES	K
4/26/2022 3:52:53 PM	TORRES	Coming down
4/26/2022 3:53:06 PM	Lakra (9052)	Yes bro
4/26/2022 3:53:18 PM	Lakra (9052)	Will leave at 4:30
4/26/2022 3:53:29 PM	TORRES	K
4/26/2022 3:53:30 PM	Lakra (9052)	Will be there at around 8
4/26/2022 3:53:49 PM	Lakra (9052)	How many pieces you have just to confirm they'll fit in my car ?
4/26/2022 3:54:09 PM	TORRES	Like last time
4/26/2022 3:54:30 PM	Lakra (9052)	Okay Like 15-18k dollars of stuff right?
4/26/2022 3:55:04 PM	TORRES	Like 15
4/26/2022 4:26:39 PM	Lakra (9052)	Liked "Like 15"
4/26/2022 4:26:46 PM	Lakra (9052)	On the way bro
4/26/2022 4:26:53 PM	TORRES	K
4/26/2022 7:55:59 PM	TORRES	ETA
4/26/2022 7:56:09 PM	Lakra (9052)	4 min
4/29/2022 2:59:40 PM	Lakra (9052)	Hey Goldy I had some extra cash this weekend I was wondering if you have any load ready i can pick it up on Sunday ? What do you think I wanted to ask you first
5/1/2022 12:11:14 PM	Lakra (9052)	Hi brother??
5/1/2022 10:32:52 PM	TORRES	Just got back out town for the weekend
5/1/2022 10:33:15 PM	TORRES	I only got like 15 cats still I let u know

5/1/2022 10:37:40 PM	Lakra (9052)	Okay bro We'll plan something for around Wednesday or Thursday Whenever is comfortable for you Just let me know
5/3/2022 10:58:40 AM	Lakra (9052)	What's up bro Anything today or tomorrow? When should i come ?
5/3/2022 11:10:59 AM	TORRES	Na
5/3/2022 11:11:22 AM	TORRES	Like 10,000 worth if u want grab that
5/3/2022 11:15:03 AM	Lakra (9052)	Ok bro so when do you think you'll have around 20k I'll come on Thursday then
5/3/2022 11:15:15 AM	Lakra (9052)	Maybe by then the market will also be a little better
5/3/2022 11:15:44 AM	Lakra (9052)	Usually it goes up on Thursday morning
5/3/2022 11:16:05 AM	Lakra (9052)	Okay so I'll come Thursday evening around 8 I'll be there
5/3/2022 11:16:08 AM	Lakra (9052)	Okay ?
5/3/2022 11:16:22 AM	TORRES	I'll let u know
5/3/2022 11:17:41 AM	Lakra (9052)	Ok bro text me
5/5/2022 11:59:20 AM	Lakra (9052)	Bro i was planning to come How many you have today?
5/5/2022 12:02:11 PM	TORRES	I am hold for a few market to low
5/5/2022 12:02:46 PM	Lakra (9052)	Ohh okay bro i know it's stupid low today lol
5/5/2022 12:03:12 PM	Lakra (9052)	I'll text you when it gets better
5/5/2022 12:03:26 PM	Lakra (9052)	Maybe next week
5/10/2022 12:57:34 PM	Lakra (9052)	Bro you wanna sell The market is going down day by day
5/10/2022 12:57:50 PM	Lakra (9052)	You wanna get rid of the material you have or you wanna hold on to it ?
5/10/2022 1:00:07 PM	TORRES	Na I'll hold
5/10/2022 1:00:45 PM	Lakra (9052)	Alright bro Text me when you ready to sell
5/10/2022 1:01:04 PM	Lakra (9052)	What market will you thinking to sell it ?
5/11/2022 6:12:31 PM	Lakra (9052)	Bro the market in going to go more down next week I don't need you to sell it to me Next week pd can go upto \$1800 / ounce
5/11/2022 6:12:45 PM	Lakra (9052)	Just trying to help you
5/11/2022 6:12:56 PM	Lakra (9052)	Let me know what you think about that
5/12/2022 2:45:11 PM	TORRES	Want come tru today
5/12/2022 2:45:41 PM	Lakra (9052)	How many you have today bro ?
5/12/2022 2:45:44 PM	Lakra (9052)	I'll come
5/12/2022 2:46:16 PM	Lakra (9052)	15- 20k or more ?
5/12/2022 2:46:31 PM	TORRES	Like 25 k
5/12/2022 2:46:48 PM	Lakra (9052)	Okay bro I'll be there
5/12/2022 2:47:52 PM	Lakra (9052)	Will be there around 8:30 pm
5/12/2022 2:48:20 PM	Lakra (9052)	Okay?
5/12/2022 2:51:15 PM	TORRES	Ok
5/12/2022 3:20:10 PM	TORRES	Close to 30k i got
5/12/2022 3:20:33 PM	Lakra (9052)	Ok bro
5/12/2022 3:20:39 PM	Lakra (9052)	I got it
5/12/2022 3:20:45 PM	TORRES	K
5/12/2022 5:29:18 PM	TORRES	U got a bigger or u coming on the Volvo
5/12/2022 5:29:43 PM	Lakra (9052)	I am coming in pick up truck
5/12/2022 5:29:48 PM	Lakra (9052)	Today
5/12/2022 5:29:57 PM	TORRES	Ohh ok yea it's better
5/12/2022 5:30:18 PM	Lakra (9052)	Yeah it will fit everything easy f250
5/12/2022 6:10:14 PM	TORRES	Yea
5/12/2022 6:43:15 PM	Lakra (9052)	I am running a little late will be there by 9:26 by maps
5/12/2022 6:45:42 PM	TORRES	K
5/16/2022 5:42:22 PM	Lakra (9052)	Bro i just wanted to let you know that this week i can only come tomorrow or Wednesday I am busy Thursday and Friday
5/16/2022 5:42:41 PM	Lakra (9052)	So let me know if you want me to come on Wednesday?? Market is also good now
5/16/2022 6:56:57 PM	Lakra (9052)	What do you think bro Let me know in advance?for the cash
5/17/2022 1:21:50 PM	TORRES	Want come tru tomorrow?

5/17/2022 1:22:01 PM	Lakra (9052)	Yeah I'll come
5/17/2022 1:22:04 PM	Lakra (9052)	What time ?
5/17/2022 1:22:48 PM	TORRES	What time good for u ?
5/17/2022 1:29:37 PM	Lakra (9052)	How much cash you need ? How much stuff you have for tomorrow?
5/17/2022 1:29:49 PM	TORRES	Like 20k
5/17/2022 1:35:49 PM	Lakra (9052)	I'll text you the time In some sometime Hopefully I'll try to come early
5/17/2022 1:38:13 PM	Lakra (9052)	Will be there around 6
5/17/2022 2:01:01 PM	Lakra (9052)	You bro what the email i did you use for the dg app I get it free for you
5/17/2022 7:16:31 PM	Lakra (9052)	Bro I'll be there by 6 to 6:30 tomorrow
5/17/2022 7:39:28 PM	TORRES	K
5/18/2022 12:09:42 PM	TORRES	Like 25k now
5/18/2022 12:09:59 PM	Lakra (9052)	Ok bro I'll take it
5/18/2022 12:10:09 PM	Lakra (9052)	Will leave around 3
5/18/2022 4:27:14 PM	TORRES	U on the way ?
5/18/2022 4:27:22 PM	Lakra (9052)	Yes
5/18/2022 4:27:35 PM	Lakra (9052)	Running little late
5/18/2022 4:27:46 PM	Lakra (9052)	Will be there by 8
5/18/2022 4:36:32 PM	Lakra (9052)	Ok
5/18/2022 4:36:34 PM	Lakra (9052)	?
5/18/2022 4:49:34 PM	Lakra (9052)	I have a van today I'll take whatever you have
5/18/2022 4:52:21 PM	TORRES	Please don't take for ever not trying be outside late
5/18/2022 6:49:42 PM	Lakra (9052)	I'll send you the eta bro
5/18/2022 6:50:07 PM	Lakra (9052)	I understand i am on my way brother
5/18/2022 6:50:19 PM	Lakra (9052)	Sorry about today
5/18/2022 8:08:14 PM	TORRES	Eta
5/18/2022 8:43:02 PM	TORRES	?
5/18/2022 8:43:27 PM	Lakra (9052)	13 min
5/18/2022 8:58:22 PM	Lakra (9052)	Here
5/24/2022 10:04:46 AM	Lakra (9052)	What's up bro
5/24/2022 3:10:08 PM	Lakra (9052)	Anything this week bro ?
5/24/2022 3:10:18 PM	TORRES	Not yet
5/24/2022 3:10:43 PM	Lakra (9052)	Alright gg text me when you have
5/29/2022 2:10:35 PM	Lakra (9052)	What's up bro When should i come in this week
5/29/2022 2:10:41 PM	Lakra (9052)	Tuesday good?
5/31/2022 9:37:02 AM	Lakra (9052)	Bro anything this week ?
5/31/2022 12:22:17 PM	TORRES	Got a small one like 13k
5/31/2022 12:23:57 PM	Lakra (9052)	I'll come Thursday then Will take whatever you have
5/31/2022 12:31:34 PM	Lakra (9052)	Ok ?
5/31/2022 12:31:41 PM	Lakra (9052)	Thursday is okay ?
5/31/2022 12:31:56 PM	TORRES	Yea
5/31/2022 12:32:04 PM	Lakra (9052)	Liked "Yea "
5/31/2022 12:32:19 PM	Lakra (9052)	Text if you get more I'll get more cash then
5/31/2022 12:32:27 PM	TORRES	If the market doesn't drop more
5/31/2022 12:33:01 PM	Lakra (9052)	Yeah Market if anything will go up till Thursday not down
5/31/2022 12:33:14 PM	Lakra (9052)	But still I'll confirm with you before leaving on Thursday
5/31/2022 12:33:18 PM	TORRES	K
6/2/2022 10:09:59 AM	TORRES	Coming tru today
6/2/2022 10:13:35 AM	Lakra (9052)	How much stuff you have
6/2/2022 10:13:40 AM	Lakra (9052)	Today ?
6/2/2022 10:15:06 AM	Lakra (9052)	So that i can get cash ?
6/2/2022 10:17:44 AM	TORRES	Around 15 20
6/2/2022 10:23:36 AM	Lakra (9052)	Its up to you bro When you want me to come Today or Monday when the market is better with a bigger load
6/2/2022 10:23:44 AM	Lakra (9052)	What do you wanna do ?

6/2/2022 10:24:51 AM	TORRES	Today not goin to keep waiting for the market to keep goin down
6/6/2022 9:02:02 AM	Lakra (9052)	I'll be there by 6 bro
6/6/2022 10:45:22 AM	Lakra (9052)	Ok ?
6/6/2022 10:47:56 AM	TORRES	Yea
6/6/2022 10:48:11 AM	Lakra (9052)	How much 30k ?? Or more
6/6/2022 11:01:27 AM	TORRES	Around 30
6/6/2022 12:54:06 PM	Lakra (9052)	👍
6/6/2022 2:05:31 PM	Lakra (9052)	I am on my way bro Will be there around 6
6/6/2022 2:08:00 PM	Lakra (9052)	Ok ?
6/6/2022 2:12:47 PM	TORRES	Ok
6/6/2022 5:58:54 PM	TORRES	ETA
6/6/2022 5:59:23 PM	Lakra (9052)	4 min bro looking for a bathroom to take a piss
6/6/2022 5:59:29 PM	TORRES	K
6/7/2022 11:34:34 AM	Lakra (9052)	Fine fine or regular?
6/7/2022 11:35:05 AM	Lakra (9052)	Regular is \$600
6/7/2022 11:35:35 AM	TORRES	Fine fine
6/7/2022 11:36:08 AM	Lakra (9052)	Fine fine \$950
6/8/2022 12:30:12 PM	TORRES	Wend can u come down
6/8/2022 12:31:07 PM	Lakra (9052)	Whenever you want bro
6/8/2022 12:31:41 PM	Lakra (9052)	I can do maybe tomorrow or Saturday morning
6/8/2022 12:31:50 PM	Lakra (9052)	I think Saturday morning will be good
6/8/2022 12:32:02 PM	Lakra (9052)	I can come in day time Saturday
6/8/2022 12:32:22 PM	TORRES	Tomorrow it's better for me
6/8/2022 12:32:31 PM	Lakra (9052)	How much stuff you have ?
6/8/2022 12:33:11 PM	Lakra (9052)	So that i can see the cash situation
6/8/2022 12:33:15 PM	TORRES	Around the same
6/8/2022 12:33:20 PM	Lakra (9052)	How much you need
6/8/2022 12:33:21 PM	TORRES	Last time
6/8/2022 12:33:25 PM	Lakra (9052)	30 ?
6/8/2022 12:33:29 PM	TORRES	25
6/8/2022 12:33:46 PM	TORRES	Haven't add everything up yet
6/8/2022 12:34:17 PM	Lakra (9052)	Okay bro no problem Give me some time I'll text you back around 5 Let me call my guy for cash
6/8/2022 3:43:49 PM	TORRES	Iam have close to 40k
6/8/2022 3:44:54 PM	Lakra (9052)	Okay bro I'll come on Saturday morning And take everything
6/8/2022 3:45:19 PM	Lakra (9052)	I'll lock your price for 40k for today's market so that you don't loose
6/8/2022 3:45:40 PM	Lakra (9052)	This is the market today
6/8/2022 3:46:10 PM	Lakra (9052)	Do you need any extra cash for yourself for buying?
6/9/2022 10:20:22 AM	Lakra (9052)	Bro buy this cat if you know someone I'll give you \$430 for each
6/9/2022 10:20:45 AM	Lakra (9052)	App is at 393
6/9/2022 10:21:05 AM	Lakra (9052)	And i am coming Saturday morning
6/9/2022 10:21:22 AM	Lakra (9052)	Got everything for you Got 50k
6/9/2022 2:22:47 PM	Lakra (9052)	You guy is here bro 😊
6/9/2022 2:22:54 PM	Lakra (9052)	We're not buying his cats
6/10/2022 12:39:44 PM	TORRES	These codes don't come up
6/10/2022 12:41:03 PM	Lakra (9052)	This is like \$340 bro
6/10/2022 12:41:37 PM	Lakra (9052)	Or send me pictures of the code
6/10/2022 2:12:44 PM	TORRES	I got like 50k in peaces maybe 55
6/10/2022 2:13:18 PM	Lakra (9052)	Okay i got it
6/10/2022 2:13:42 PM	Lakra (9052)	Will be there tomorrow at 11:30 aprox
6/10/2022 2:13:46 PM	TORRES	K
6/10/2022 2:13:53 PM	Lakra (9052)	Have all cash arranged for you
6/10/2022 2:14:13 PM	Lakra (9052)	Don't worry lol
6/10/2022 2:14:20 PM	TORRES	K lol

6/10/2022 2:14:44 PM	TORRES	Can u Bring like 15 extra
6/10/2022 2:15:00 PM	TORRES	I am waiting on another load right now
6/10/2022 2:15:30 PM	TORRES	Market drops everyone go crazy trying to sell lol
6/10/2022 2:15:52 PM	Lakra (9052)	Yeah i know market is crazy getting low
6/10/2022 2:16:24 PM	Lakra (9052)	I will try my best bro to bring as much as i can
6/10/2022 2:17:03 PM	TORRES	I am grab this load and stop for the day
6/10/2022 2:17:33 PM	Lakra (9052)	I'll also come Monday or Tuesday with more for you just in case
6/10/2022 2:18:04 PM	Lakra (9052)	Just in case I couldn't get enough cash for tomorrow
6/10/2022 2:18:31 PM	Lakra (9052)	I have around 60 something right now Trying to get more for you
6/10/2022 2:20:00 PM	Lakra (9052)	Ok bro
6/11/2022 9:31:04 AM	Lakra (9052)	On the way
6/11/2022 9:31:12 AM	Lakra (9052)	12:50 eta
6/11/2022 9:33:59 AM	TORRES	K
6/11/2022 1:48:52 PM	Lakra (9052)	I am outside bro
6/15/2022 5:55:05 PM	Lakra (9052)	anything tomorrow? Yeah
6/15/2022 5:55:36 PM	TORRES	Lil something
6/15/2022 5:55:51 PM	Lakra (9052)	Around how much ?
6/15/2022 5:55:52 PM	TORRES	I'll let you know what I get tomorrow
6/15/2022 5:56:10 PM	Lakra (9052)	Okay I'll get 10-15k for you
6/18/2022 7:04:00 PM	TORRES	Bro u think u can come down tomorrow
6/18/2022 7:07:09 PM	Lakra (9052)	How much stuff you have
6/18/2022 7:09:14 PM	TORRES	20k
6/18/2022 7:09:42 PM	TORRES	And I am leaving Monday for a week
6/18/2022 7:36:54 PM	Lakra (9052)	Yeah bro I'll come
6/18/2022 7:36:57 PM	Lakra (9052)	What time ??
6/18/2022 7:37:10 PM	Lakra (9052)	Pick up the call
6/18/2022 7:37:19 PM	Lakra (9052)	Call me
6/18/2022 8:45:30 PM	Lakra (9052)	Bro I cannot come tomorrow I have the money and everything but i am not able to get U-Haul
6/18/2022 8:45:55 PM	Lakra (9052)	I'll buy everything if you want to drive down tomorrow to my address
6/18/2022 8:45:58 PM	Lakra (9052)	Just one time
6/18/2022 8:46:35 PM	Lakra (9052)	I don't have a vehicle or truck □ for tomorrow to bring
6/18/2022 8:46:52 PM	Lakra (9052)	I'll buy if you can drive down just for tomorrow
6/18/2022 8:47:01 PM	Lakra (9052)	All cash
6/18/2022 8:47:16 PM	TORRES	I can't drive down got alot to get ready
6/18/2022 8:48:03 PM	TORRES	U-haul close out there ?
6/18/2022 8:48:22 PM	Lakra (9052)	Nothing available right on the spot to rent
6/18/2022 8:48:47 PM	TORRES	What about the Volvo they fit
6/18/2022 8:48:54 PM	Lakra (9052)	Bro for tomorrow you have to adjust I'll buy everything If you can't come then send somebody
6/18/2022 8:49:31 PM	Lakra (9052)	I don't have the volvo my brother took it to PA i have corolla it won't fit in that
6/18/2022 8:49:44 PM	Lakra (9052)	If you send someone I'll take care of him
6/18/2022 8:49:52 PM	Lakra (9052)	Will give him good tip
6/18/2022 8:50:04 PM	TORRES	Can't don't got nobody to go down
6/18/2022 8:50:56 PM	Lakra (9052)	Then I don't know what to tell you bro Then I'll come when you're back
6/18/2022 8:51:11 PM	Lakra (9052)	No other option for tomorrow i have
6/18/2022 8:52:31 PM	Lakra (9052)	Ask your friend if he can come tomorrow
6/18/2022 8:52:35 PM	Lakra (9052)	I'll pay him
6/18/2022 8:53:09 PM	Lakra (9052)	Just for tomorrow
6/18/2022 8:58:54 PM	TORRES	I'll check if I find somebody
6/18/2022 9:01:05 PM	Lakra (9052)	Ok let me know
6/18/2022 10:01:32 PM	Lakra (9052)	Bro were you able to find anyone to come ?
6/18/2022 10:01:59 PM	TORRES	Na nobody
6/18/2022 10:02:13 PM	Lakra (9052)	Damn

6/18/2022 10:02:27 PM	Lakra (9052)	I also couldn't find any vehicle bro
6/18/2022 10:02:39 PM	Lakra (9052)	You have to find someone
6/19/2022 9:22:41 AM	Lakra (9052)	Bro is anybody coming or cancel for today
6/19/2022 9:23:00 AM	Lakra (9052)	Because i still couldn't find any vehicle to come
6/19/2022 1:09:34 PM	Lakra (9052)	120 neilson street New Brunswick, New Jersey
6/19/2022 1:17:59 PM	Lakra (9052)	Bro confirm me if he's coming?
6/19/2022 1:42:27 PM	Lakra (9052)	Bro confirm me My cash guy will go Let me know if your guy is coming today or I'll pick everything on Thursday
6/19/2022 2:40:10 PM	TORRES	Leaving at 330
6/19/2022 2:55:28 PM	Lakra (9052)	Send me your guys number
6/19/2022 3:42:17 PM	TORRES	He on the way
6/19/2022 3:42:24 PM	Lakra (9052)	Okay
6/19/2022 5:49:30 PM	TORRES	Hour n half
6/19/2022 5:51:14 PM	Lakra (9052)	Ok no problem
6/19/2022 7:14:36 PM	Lakra (9052)	What is his eta ?
6/19/2022 7:15:10 PM	TORRES	30 min
6/19/2022 7:20:17 PM	Lakra (9052)	Ok text me
6/19/2022 7:22:25 PM	TORRES	Should be there soon 10 min
6/19/2022 7:22:39 PM	Lakra (9052)	Ok
6/19/2022 7:22:46 PM	Lakra (9052)	How do you want me to price everything
6/19/2022 7:22:51 PM	Lakra (9052)	Should I FaceTime you
6/19/2022 7:23:03 PM	Lakra (9052)	Or he knows the price
6/19/2022 7:23:26 PM	TORRES	Just price them and let me know how much
6/19/2022 7:23:36 PM	TORRES	I know how much I send
6/19/2022 7:23:43 PM	TORRES	Don't be slick
6/19/2022 7:24:42 PM	Lakra (9052)	Omg bro i am never slick Coming to you every week Doing business I don't need to be slick
6/19/2022 7:24:46 PM	Lakra (9052)	Trust me
6/19/2022 7:25:02 PM	Lakra (9052)	We both make money that's what i want We both
6/19/2022 7:26:31 PM	Lakra (9052)	No problem I'll let you know how much is it If anything is half or missing I'll send you pictures
6/19/2022 7:45:23 PM	Lakra (9052)	He's here ? Tell him i am waiting outside in a black t shirt
6/19/2022 8:14:24 PM	Lakra (9052)	[SENDS SCREEN CAPTURE OF CALCULATOR APPLICATION WITH "23,357"]
6/19/2022 8:14:26 PM	Lakra (9052)	Total
6/19/2022 8:15:43 PM	TORRES	K
6/27/2022 11:52:42 AM	Lakra (9052)	What's up bro
6/28/2022 12:34:57 PM	Lakra (9052)	Bro how much stuff you sending with your guy tomorrow Let me know So that i can put cash aside
6/28/2022 12:47:15 PM	TORRES	Like 35
6/28/2022 12:50:02 PM	Lakra (9052)	You sending your guy tomorrow around what time like 5-6 ?
6/28/2022 12:57:17 PM	TORRES	So u not paying 5 percent over
6/28/2022 12:59:53 PM	Lakra (9052)	Yes i will I'll give you 310
6/28/2022 1:00:06 PM	Lakra (9052)	According to the market today
6/28/2022 1:01:05 PM	TORRES	Can u send 15k extra
6/28/2022 1:03:04 PM	TORRES	And come down on the weekend?
6/28/2022 1:05:06 PM	TORRES	They want go early in the morning
6/28/2022 1:09:34 PM	Lakra (9052)	Its okay send him in the morning
6/28/2022 1:10:08 PM	Lakra (9052)	I am busy on the weekend bro You told me you're sending him tomorrow
6/28/2022 1:10:21 PM	Lakra (9052)	Confirm me if he is coming or not
6/28/2022 1:40:01 PM	Lakra (9052)	527 okerson rd Freehold, New Jersey Send him to this address
6/28/2022 11:40:16 PM	Lakra (9052)	Text me when he leaves from Massachusetts?
6/28/2022 11:49:13 PM	TORRES	K
6/29/2022 7:08:17 AM	Lakra (9052)	How far is the guy

6/29/2022 8:03:06 AM	Lakra (9052)	Bro is he coming today or not If not I'll give cash to someone else
6/29/2022 8:03:18 AM	Lakra (9052)	If he is coming I'll save the cash
6/29/2022 8:39:32 AM	TORRES	Already told u yea yesterday y keep asking
6/29/2022 8:40:15 AM	Lakra (9052)	You told me he'll be here at 8
6/29/2022 8:40:24 AM	Lakra (9052)	I am just asking his eta
6/29/2022 8:40:35 AM	TORRES	Told u he leaving at 8
6/29/2022 8:40:59 AM	Lakra (9052)	Ok
6/29/2022 8:51:46 AM	TORRES	Reset my app
6/29/2022 8:52:49 AM	TORRES	Market goin up y the prices still the same
6/29/2022 8:54:02 AM	Lakra (9052)	Check now
6/29/2022 10:39:26 AM	Lakra (9052)	Bro what's his eta Can you ask him ?
6/29/2022 10:40:09 AM	TORRES	Like 3 hours he said there mad traffic
6/29/2022 10:48:31 AM	Lakra (9052)	Damn bro Ok its fine
6/29/2022 1:37:18 PM	Lakra (9052)	What's the eta bro ?
6/29/2022 1:46:15 PM	TORRES	1 hour away
6/29/2022 1:46:32 PM	Lakra (9052)	Ok
6/29/2022 2:01:42 PM	TORRES	Y my app number goin down and the market goin up lol 😊
6/29/2022 2:05:06 PM	TORRES	Reset it again
6/29/2022 2:07:43 PM	Lakra (9052)	Done
6/29/2022 2:08:03 PM	Lakra (9052)	Something is wrong with your email
6/29/2022 2:09:07 PM	Lakra (9052)	That's why it happens again
6/29/2022 2:09:19 PM	Lakra (9052)	I fixed it forever now
6/29/2022 3:00:01 PM	TORRES	10 min
6/29/2022 3:01:22 PM	Lakra (9052)	Ok
6/30/2022 5:08:09 PM	TORRES	Can u come down on the weekend?
6/30/2022 5:09:33 PM	Lakra (9052)	Weekend is hard bro No cash on this weekend 4th July I'll come down on Tuesday when banks open
6/30/2022 5:09:43 PM	Lakra (9052)	If you want a cheque i can come on the weekend
6/30/2022 5:10:16 PM	Lakra (9052)	Let me know how much cash for Tuesday tho ??
6/30/2022 5:10:47 PM	Lakra (9052)	40 - 50 ?
6/30/2022 5:11:24 PM	TORRES	U don't got half cash if I send them up
6/30/2022 5:11:49 PM	Lakra (9052)	How much ?
6/30/2022 5:11:59 PM	TORRES	Like 20 cash
6/30/2022 5:12:26 PM	Lakra (9052)	I can do 20 i think When will you send them ?
6/30/2022 5:12:41 PM	TORRES	I'll let u know by tonight
6/30/2022 5:12:49 PM	Lakra (9052)	Ok let me know
6/30/2022 10:43:37 PM	TORRES	He can go in the afternoon
6/30/2022 10:51:47 PM	TORRES	And be there by 2
6/30/2022 11:14:12 PM	Lakra (9052)	Ok on which day tho Sunday?
6/30/2022 11:14:38 PM	TORRES	Tomorrow
6/30/2022 11:23:46 PM	Lakra (9052)	Ok send him
6/30/2022 11:24:23 PM	Lakra (9052)	Ask him to leave around afternoon time
6/30/2022 11:37:17 PM	TORRES	He leaving around 11
6/30/2022 11:40:44 PM	Lakra (9052)	Ok
7/1/2022 11:46:07 AM	Lakra (9052)	Your guy left
7/1/2022 11:46:10 AM	Lakra (9052)	?
7/1/2022 12:15:15 PM	TORRES	Yea right now
7/1/2022 6:13:30 PM	Lakra (9052)	Gave your guy \$200 tip
7/5/2022 2:58:41 PM	TORRES	Wend can u come down
7/5/2022 2:59:14 PM	Lakra (9052)	I am coming on Thursday to rmv of springfeild
7/5/2022 2:59:34 PM	Lakra (9052)	So I'll come to you after that
7/5/2022 2:59:46 PM	Lakra (9052)	How much you have ?
7/5/2022 3:00:34 PM	TORRES	K like 25
7/5/2022 3:01:19 PM	Lakra (9052)	Ok

7/5/2022 4:37:21 PM	TORRES	Hm these
7/5/2022 4:37:52 PM	Lakra (9052)	No code \$125
7/6/2022 5:45:59 PM	Lakra (9052)	Anything for tomorrow ?
7/6/2022 5:46:13 PM	Lakra (9052)	How much stuff you have to sell if i come tomorrow?
7/6/2022 5:47:03 PM	TORRES	Like 25 k
7/6/2022 6:05:22 PM	TORRES	Around what time u be down here
7/6/2022 6:32:22 PM	Lakra (9052)	Around like 4:30
7/6/2022 6:32:51 PM	Lakra (9052)	Bro i have a small car Please cut all the extra pipe and everything so that i can fit everything
7/6/2022 11:16:35 PM	TORRES	Probably goin to have like 35k someone coming in the morning
7/7/2022 3:28:27 PM	TORRES	ETA
7/7/2022 3:34:44 PM	Lakra (9052)	1 hr
7/7/2022 3:39:37 PM	Lakra (9052)	Maybe a little more than 1 hr
7/11/2022 1:52:52 PM	Lakra (9052)	Send me pictures of material
7/12/2022 6:29:11 PM	TORRES	Can u come down this week
7/12/2022 6:42:38 PM	Lakra (9052)	When ? Thursday or Friday?
7/12/2022 6:42:58 PM	TORRES	Thursday fine
7/12/2022 6:43:07 PM	Lakra (9052)	How much you have ?
7/12/2022 6:43:32 PM	TORRES	25 around there
7/12/2022 6:57:44 PM	Lakra (9052)	Ok done
7/12/2022 6:58:03 PM	Lakra (9052)	Make sure you cut 3lm pipes and all that I'll bring small car
7/12/2022 7:00:52 PM	TORRES	Yea already set
7/13/2022 5:53:36 PM	TORRES	Around what time u coming
7/13/2022 5:54:20 PM	Lakra (9052)	Probably around 7-7:30
7/13/2022 5:54:42 PM	Lakra (9052)	Around 25k tomorrow right?
7/13/2022 6:02:18 PM	TORRES	K yea
7/13/2022 6:02:52 PM	TORRES	1200 on Prius stick 🚗
7/13/2022 6:04:39 PM	Lakra (9052)	\$1155 max i can do bro
7/14/2022 12:20:12 PM	TORRES	Reset my app y my boy regular app higher then mine smh
7/14/2022 12:23:45 PM	Lakra (9052)	Bro check it again It should be same
7/14/2022 3:07:38 PM	Lakra (9052)	On the way
7/14/2022 3:07:56 PM	Lakra (9052)	Will be there around 6:30 ish
7/14/2022 3:18:30 PM	TORRES	K
7/14/2022 6:13:09 PM	TORRES	ETA
7/14/2022 6:14:22 PM	Lakra (9052)	Running late with traffic Eta 7:45
7/14/2022 7:55:08 PM	TORRES	Wya
7/14/2022 7:55:24 PM	Lakra (9052)	Here
7/14/2022 7:55:29 PM	Lakra (9052)	Backing in
7/18/2022 8:04:53 PM	TORRES	Yo yo
7/18/2022 8:25:39 PM	Lakra (9052)	What's up bro
7/18/2022 8:27:01 PM	TORRES	What's good can I send my boy up
7/18/2022 8:28:23 PM	Lakra (9052)	Wednesday I'll get cash you can send Wednesday
7/18/2022 8:28:54 PM	TORRES	K
7/19/2022 5:31:30 PM	TORRES	What time can he go up
7/19/2022 5:34:41 PM	Lakra (9052)	How much worth of stuff you're sending
7/19/2022 5:34:54 PM	TORRES	25
7/19/2022 5:35:13 PM	Lakra (9052)	Send him anytime before 3 pm
7/19/2022 5:35:36 PM	Lakra (9052)	To this address 527 okerson road, freehold New Jersey-07728
7/19/2022 8:51:13 PM	TORRES	Got close to 35k lam doin the math wile I put them in
7/19/2022 8:52:24 PM	Lakra (9052)	Ok bro let me know
7/20/2022 10:39:00 AM	Lakra (9052)	What time your guy coming
7/20/2022 10:39:10 AM	Lakra (9052)	Make sure he's not late than 3
7/20/2022 10:57:15 AM	TORRES	He on the way
7/20/2022 10:57:24 AM	TORRES	Left a 9
7/20/2022 10:59:15 AM	Lakra (9052)	Ok Text me when he's here

7/20/2022 12:21:52 PM	TORRES	There 4 dobbble shield please do the Hondas right Gad pay top dollar for everything
7/20/2022 12:22:08 PM	TORRES	He be there in 20 min
7/20/2022 2:41:40 PM	Lakra (9052)	\$32600 paid to your guy
7/21/2022 2:48:53 PM	TORRES	Yo yo
7/21/2022 2:49:34 PM	Lakra (9052)	What's up
7/21/2022 2:56:24 PM	TORRES	Can I send em up tomorrow
7/21/2022 2:57:05 PM	Lakra (9052)	We closed tomorrow bro Closed for 3 days Send them Monday
7/21/2022 2:57:14 PM	Lakra (9052)	Told you we're moving
7/21/2022 2:58:08 PM	Lakra (9052)	I'll text you when you can send them or I'll come may be Tuesday if i can
7/21/2022 2:58:52 PM	Lakra (9052)	Ok ?
7/21/2022 3:00:10 PM	TORRES	Can't grab some today?
7/21/2022 3:00:31 PM	Lakra (9052)	No cash available bro
7/21/2022 3:00:46 PM	Lakra (9052)	I am in PA for 3 days till Sunday
7/24/2022 11:45:36 AM	TORRES	What's uppp
7/24/2022 1:17:03 PM	Lakra (9052)	What's up bro
7/24/2022 1:18:25 PM	Lakra (9052)	Wanna send him tomorrow?
7/24/2022 1:18:30 PM	Lakra (9052)	How much you have for tomorrow?
7/24/2022 1:19:26 PM	TORRES	Yea got like 45 k
7/24/2022 1:20:40 PM	Lakra (9052)	Okay Send me your wire information Can't do all cash tomorrow
7/24/2022 1:20:54 PM	TORRES	Hm u think ?
7/24/2022 1:21:29 PM	Lakra (9052)	Need to check tomorrow how much cash is left Not been on the shop since 3 days
7/24/2022 1:21:53 PM	Lakra (9052)	Cheque or wire tomorrow
7/24/2022 10:04:56 PM	TORRES	What time good to go up
7/24/2022 10:05:17 PM	Lakra (9052)	Around 3 pm
7/25/2022 11:05:18 AM	TORRES	Can he get there after 3 ???
7/25/2022 1:35:44 PM	TORRES	On the way
7/25/2022 1:36:09 PM	Lakra (9052)	What is the eta ?
7/25/2022 1:38:49 PM	TORRES	5:12 PM
7/25/2022 1:39:06 PM	TORRES	There mad traffic
7/25/2022 1:41:27 PM	Lakra (9052)	Damn bro its late Wire can't be done today
7/25/2022 1:41:55 PM	Lakra (9052)	I think I'll give 15k cash rest wire tomorrow
7/25/2022 1:42:08 PM	TORRES	That's fine
7/25/2022 1:42:40 PM	TORRES	U can't get 5k more at least ?
7/25/2022 1:43:18 PM	Lakra (9052)	I'll see if i can do it
7/25/2022 1:43:35 PM	TORRES	Got bunch I got buy wend I get back tonight
7/25/2022 1:45:12 PM	Lakra (9052)	I'll try bro if i have anything left
7/25/2022 4:39:06 PM	Lakra (9052)	Send your wire information bro ?
7/25/2022 4:56:06 PM	TORRES	[IMAGE of account information]
7/25/2022 4:56:15 PM	TORRES	Citizens bank
7/25/2022 4:56:48 PM	TORRES	Jose torres 24 Leete st Springfield mass 01108
7/25/2022 4:57:10 PM	Lakra (9052)	This is bank address or your house address?
7/25/2022 4:57:21 PM	TORRES	My address
7/25/2022 4:57:24 PM	Lakra (9052)	Ok
7/26/2022 11:45:22 AM	Lakra (9052)	[Sends Image of Account Information for account ending in 2835]
7/26/2022 11:50:25 AM	Lakra (9052)	Fill this bro and send it back to me
7/26/2022 11:50:37 AM	Lakra (9052)	And your wire will be sent
7/26/2022 11:50:56 AM	Lakra (9052)	It needs your social security name and signature
7/26/2022 12:14:06 PM	TORRES	[SSN]
7/26/2022 1:05:07 PM	Lakra (9052)	[IMAGE OF SIGNED W9 FORM]
7/26/2022 3:07:47 PM	Lakra (9052)	Your wire is sent
7/26/2022 5:08:42 PM	Lakra (9052)	Got it ?
7/26/2022 5:21:49 PM	TORRES	Yea

7/28/2022 9:55:24 AM	TORRES	What's up
7/28/2022 9:55:41 AM	TORRES	Coming down
7/28/2022 2:55:15 PM	Lakra (9052)	Will be leaving around 4:30 -5
7/28/2022 2:55:15 PM	Lakra (9052)	Got cash for you
7/28/2022 3:02:25 PM	TORRES	K
7/28/2022 6:08:40 PM	Lakra (9052)	Eta 9:25
7/28/2022 6:08:46 PM	Lakra (9052)	Traffic
7/28/2022 8:55:39 PM	TORRES	What's the eta bout to grab some food quick
7/28/2022 9:12:58 PM	Lakra (9052)	Yeah bro you can go grab the food
7/28/2022 9:13:09 PM	Lakra (9052)	Eta is 46 more min
7/28/2022 9:13:22 PM	Lakra (9052)	Will be there around lik 9:58
7/28/2022 9:55:38 PM	Lakra (9052)	4 min away
8/8/2022 2:22:07 PM	TORRES	Yo yo yo
8/8/2022 2:23:14 PM	Lakra (9052)	What's up bro
8/8/2022 2:23:58 PM	TORRES	Can I go down tomorrow
8/8/2022 3:01:30 PM	Lakra (9052)	Come Wednesday morning
8/8/2022 3:01:35 PM	Lakra (9052)	How much stuff you have ?
8/8/2022 3:01:46 PM	TORRES	Right now like 30
8/8/2022 4:58:57 PM	Lakra (9052)	Send him Wednesday early morning
8/8/2022 10:31:33 PM	TORRES	K
8/9/2022 3:45:16 PM	Lakra (9052)	Bro i have 20k cash for you for tomorrow
8/9/2022 3:48:59 PM	TORRES	K
8/9/2022 3:49:12 PM	TORRES	The rest wire ??
8/9/2022 3:49:42 PM	Lakra (9052)	Yes
8/9/2022 4:14:06 PM	TORRES	Reset my app smh
8/9/2022 4:24:33 PM	Lakra (9052)	Its already set
8/9/2022 4:39:18 PM	TORRES	Loading and doin the total wile i load up
8/9/2022 4:56:27 PM	Lakra (9052)	Ok perfect
8/9/2022 4:56:33 PM	Lakra (9052)	Let me know how much is it
8/9/2022 4:56:43 PM	Lakra (9052)	Come early morning around 8am
8/9/2022 5:00:57 PM	TORRES	Right now we at 30
8/9/2022 5:01:05 PM	Lakra (9052)	Ok
8/10/2022 7:46:59 AM	TORRES	Yo yo
8/10/2022 8:03:22 AM	Lakra (9052)	Whats up
8/10/2022 8:03:29 AM	Lakra (9052)	You here ?
8/10/2022 8:03:41 AM	TORRES	Yea
8/10/2022 8:44:13 AM	TORRES	U don't got more cash then 20?
8/10/2022 6:38:28 PM	TORRES	No wire
8/10/2022 6:56:38 PM	Lakra (9052)	Wire will hit tomorrow bro
8/10/2022 6:56:49 PM	Lakra (9052)	Couldn't approve today
8/10/2022 6:56:57 PM	Lakra (9052)	Tomorrow it will come 100 percent
8/11/2022 12:38:03 PM	Lakra (9052)	You got the wire bro ?
8/11/2022 12:45:16 PM	TORRES	Haven't checked
8/11/2022 12:49:37 PM	Lakra (9052)	I'll let you know
8/11/2022 12:49:38 PM	Lakra (9052)	It should come late today
8/11/2022 12:52:15 PM	TORRES	I need it now
8/11/2022 12:52:25 PM	TORRES	Got people coming smh
8/11/2022 1:39:06 PM	Lakra (9052)	I know bro its the bank not me I already set your wire its \$12830/-
8/11/2022 1:41:14 PM	TORRES	Iam send him up tomorrow but what time
8/11/2022 1:41:31 PM	TORRES	Cuz he be leaving To early lol
8/11/2022 2:07:05 PM	Lakra (9052)	I have 25k cash for you tomorrow
8/11/2022 2:07:29 PM	Lakra (9052)	Ask him to be here around 8
8/11/2022 2:07:38 PM	Lakra (9052)	8 to 8:30
8/11/2022 2:07:48 PM	TORRES	K
8/11/2022 5:23:08 PM	Lakra (9052)	Wire sent

8/11/2022 5:23:18 PM	Lakra (9052)	Your guy coming tomorrow right?
8/11/2022 5:27:08 PM	TORRES	Yea
8/12/2022 9:45:26 AM	Lakra (9052)	23800/- paid
8/12/2022 9:45:35 AM	TORRES	K
8/16/2022 3:18:30 PM	TORRES	Yo yo
8/16/2022 4:28:36 PM	Lakra (9052)	No cash tomorrow bro
8/16/2022 4:28:48 PM	Lakra (9052)	Don't send him tomorrow We're moving tomorrow
8/16/2022 4:28:54 PM	TORRES	Smh
8/16/2022 4:28:55 PM	Lakra (9052)	Send him Friday
8/16/2022 4:29:07 PM	TORRES	I got a uhall already
8/16/2022 4:29:36 PM	Lakra (9052)	I can do wire tomorrow
8/16/2022 4:29:46 PM	Lakra (9052)	Can't do cash for tomorrow brother
8/18/2022 5:30:38 PM	TORRES	Can u come down on the weekend?
8/18/2022 5:31:27 PM	Lakra (9052)	I can't bro you'll have to send him Monday or tomorrow
8/22/2022 3:25:51 PM	Lakra (9052)	Yo yo
8/22/2022 3:27:11 PM	TORRES	Yo
8/22/2022 3:27:51 PM	Lakra (9052)	What time tomorrow?
8/22/2022 3:28:16 PM	Lakra (9052)	Send him around 10- 11
8/22/2022 3:28:19 PM	Lakra (9052)	Am
8/22/2022 3:29:18 PM	TORRES	K
8/22/2022 3:29:38 PM	Lakra (9052)	How much 35k or more?
8/22/2022 3:29:54 PM	TORRES	Around there
8/22/2022 3:30:01 PM	TORRES	Haven't load it up
8/22/2022 3:30:05 PM	Lakra (9052)	Ok
8/22/2022 3:30:48 PM	Lakra (9052)	You're volume going down bro From last couple of weeks you're only doing 30-35 k a week
8/22/2022 3:31:06 PM	TORRES	Can u take these with the chains lol
8/22/2022 3:31:08 PM	Lakra (9052)	You reached 85k a week once
8/22/2022 3:31:30 PM	Lakra (9052)	Lol
8/22/2022 3:31:48 PM	TORRES	There mad work to take em off lol 🤔
8/22/2022 3:31:49 PM	Lakra (9052)	Bro please try to get these chains off the refinery will kot accept
8/22/2022 3:31:57 PM	TORRES	K
8/23/2022 11:59:39 AM	TORRES	U giving him some today ?
8/23/2022 11:59:50 AM	Lakra (9052)	Yeah i will
8/23/2022 12:00:22 PM	Lakra (9052)	Your total 35638/-
8/23/2022 12:05:08 PM	TORRES	K
8/23/2022 4:11:56 PM	TORRES	Did u give him something
8/23/2022 4:12:18 PM	Lakra (9052)	Yes \$100
8/23/2022 4:12:32 PM	TORRES	That's it lol
8/23/2022 4:13:14 PM	Lakra (9052)	Bro how much should i give My guys unloaded the van themselves
8/23/2022 4:13:21 PM	Lakra (9052)	I had to give my guys tip tpp
8/23/2022 4:13:23 PM	Lakra (9052)	Lol
8/23/2022 4:13:32 PM	Lakra (9052)	3 peoy
8/23/2022 4:13:35 PM	Lakra (9052)	People
8/23/2022 4:15:28 PM	TORRES	How much was the total
8/23/2022 4:16:06 PM	Lakra (9052)	35700/-
8/23/2022 7:44:12 PM	TORRES	Can u come down n get some this week
8/25/2022 12:03:13 PM	Lakra (9052)	21900/-
8/25/2022 3:17:45 PM	Lakra (9052)	What's up bro?
8/25/2022 3:18:16 PM	TORRES	Call me when u can
8/25/2022 3:18:33 PM	Lakra (9052)	Will call you in 10 min
8/25/2022 3:39:39 PM	TORRES	Ya got more cash to send him up soon
8/26/2022 10:28:09 AM	Lakra (9052)	26576/-
8/26/2022 10:47:32 AM	Lakra (9052)	What's up

8/26/2022 10:48:14 AM	TORRES	Nothing lam just start goin up cuz the math never right and I keep talking loses
8/26/2022 10:55:16 AM	Lakra (9052)	What did you loose bro I haven't paid him full
8/26/2022 10:55:21 AM	Lakra (9052)	You have balance left
8/26/2022 10:55:35 AM	Lakra (9052)	How much do your math say your total was
8/26/2022 10:55:36 AM	Lakra (9052)	?
8/26/2022 10:55:43 AM	TORRES	What's the balance
8/26/2022 10:56:36 AM	Lakra (9052)	What was it on your total
8/26/2022 10:56:43 AM	TORRES	It was close to 30 wend I load it up last night
8/26/2022 10:58:26 AM	Lakra (9052)	2100 balance
8/26/2022 10:58:58 AM	Lakra (9052)	Didn't had enough cash
8/26/2022 10:59:39 AM	TORRES	What u give him 26,576??
8/26/2022 10:59:56 AM	Lakra (9052)	26600/-
8/26/2022 11:00:13 AM	Lakra (9052)	Total was close to 29
8/26/2022 11:00:45 AM	TORRES	He said he got only 26000
8/26/2022 11:01:01 AM	TORRES	Lol
8/26/2022 11:01:32 AM	Lakra (9052)	In total i gave him 26700/- 100 extra for his tip
8/26/2022 11:01:40 AM	Lakra (9052)	He's laying
8/26/2022 11:01:45 AM	Lakra (9052)	26600/- for you
8/26/2022 11:02:58 AM	TORRES	Yea he got it smh 🤔 dude slow af
8/26/2022 1:49:19 PM	Lakra (9052)	Goldy slow down for couple of weeks
8/26/2022 1:49:19 PM	Lakra (9052)	Don't buy